

Oregon Greater Sage-Grouse

Record of Decision and Approved Resource Management Plan Amendment



The Bureau of Land Management's multiple-use mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

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Table of Contents

| | | |
|-----|--|----|
| 0. | Summary..... | 2 |
| 1. | Introduction | 3 |
| 2. | Planning Area | 5 |
| 3. | Decision..... | 5 |
| 4. | Alternatives Considered in the Proposed RMPA and Final EIS | 7 |
| 5. | Management Considerations | 10 |
| 6. | Mitigation | 14 |
| 7. | Plan Monitoring..... | 16 |
| 8. | Public Involvement, Consultation, and Coordination..... | 16 |
| 9. | Availability of the ROD and Approved RMPA..... | 19 |
| 10. | Approval | 20 |

0. SUMMARY

This 2019 Record of Decision (ROD) and Approved Resource Management Plan Amendment supports the Bureau of Land Management (BLM) Field Office Resource Management Plans in Oregon, including eight plans in the Burns, Lakeview, Prineville, and Vale Districts. The Oregon Approved Resource Management Plan Amendment makes 21,959 acres of key Research Natural Areas available to livestock grazing. It also updates language relating to compensatory mitigation to bring the 2015 Oregon Greater Sage-Grouse Approved Resource Management Plan Amendments into consistency with current Department and BLM mitigation direction and policy. These six 2019 Approved Resource Management Plan Amendments build on the work that was completed in 2015 to respond to the deteriorating health of the sagebrush landscapes of the American West and the declining population of the Greater Sage-Grouse, a ground-dwelling bird that was under consideration by the U.S. Fish and Wildlife Service (FWS) for protection under the Endangered Species Act (ESA).

The BLM has amended its Resource Management Plan Amendments for Greater Sage-Grouse habitat management to provide additional consistency and alignment with the State of Oregon's Greater Sage-Grouse Action Plan, program, and authorities. On March 29, 2017, the Secretary of the Interior (Secretary) issued Secretary's Order (SO) 3349, American Energy Independence, which ordered agencies to reexamine practices "to better balance conservation strategies and policies with the equally legitimate need of creating jobs for hard-working American families." On June 7, 2017, the Secretary issued SO 3353, with a purpose of enhancing cooperation among 11 western states and the BLM in managing and conserving Greater Sage-Grouse. SO 3353 directed an Interior Review Team, consisting of the BLM, FWS, and the U.S. Geological Survey (USGS), to coordinate with the Greater Sage-Grouse Task Force. The agencies were also directed to review the 2015 Greater Sage-Grouse plans and associated policies to identify provisions that may require modification to make the plans more consistent with the individual state plans and to better balance the BLM's multiple-use mission. On August 4, 2017, the Interior Review Team submitted its report in response to SO 3353, and recommended modifying the Greater Sage-Grouse plans and associated policies to better align with the individual state plans. The Oregon 2019 Greater Sage-Grouse Approved Resource Management Plan Amendment implements that direction.

RECORD OF DECISION AND APPROVED RESOURCE MANAGEMENT PLAN AMENDMENT

1. INTRODUCTION

The Bureau of Land Management (BLM) manages Greater Sage-Grouse habitat as part of the agency's multiple use mission. In 2015, eight Resource Management Plans covering BLM-managed public lands in Oregon were amended to include specific management allocations, resource objectives, and management decisions for three designated Greater Sage-Grouse Habitat Management Areas (HMAs) to help ensure conservation, enhancement, and restoration of Greater Sage-Grouse habitat.

The BLM has used these initial resource management plans as a platform for its ongoing commitment to on-the-ground activities that promote conservation through close coordination with state, local, and private partners. Most notably, in coordination with the contributions of multiple partners, the BLM has treated an increased numbers of acres of sagebrush steppe habitat every fiscal year since 2015, accomplishing important goals for sage-grouse conservation and other programs and activities, including fuels, riparian, and range management.

These habitat projects show that successful conservation of Greater Sage-Grouse requires a shared stewardship vision among states, private citizens, landowners, and federal land management agencies. Current law and regulations put state and local agencies at the forefront of efforts to maintain healthy fish and wildlife populations and to conserve at-risk species, and state-led efforts to conserve Greater Sage-Grouse and its habitat date back to the 1950s. For the past two decades, state wildlife agencies, local agencies, federal agencies and many others interested in the health of the species have been collaborating to conserve Greater Sage-Grouse and its habitats.

With the publication of these Records of Decision (RODs) and Approved Resource Management Plan Amendments (ARMPAs), the BLM is now concluding a planning effort focused on furthering cooperation with western states by ensuring greater consistency between individual state plans for managing the Greater Sage-Grouse as a wildlife species and the BLM's multiple-use mission for managing public land resources, including wildlife habitat. The planning process has given the BLM an opportunity to work with states and other partners to promote shared conservation goals, strike a regulatory balance, and build trust as it finds ways to sustainably develop public land resources for multiple-uses. The effort focused on ways to increase management flexibility, maintain access to public resources, promote positive conservation outcomes for Greater Sage-Grouse, and incorporate new information that is considered the best available science and is rooted in on-the-ground experience.

On October 11, 2017, following direction in Secretary's Order (SO) 3353 to enhance cooperation among 11 western states and the BLM in managing and conserving Greater Sage-Grouse, the BLM issued a Notice of Intent to amend the 2015 Approved Resource Management Plan Amendments guiding Greater Sage-Grouse habitat management, focused on bringing the plans into closer alignment with the individual states' species management plans and conservation strategies. Reflecting the commitment by the Department of the Interior, the Notice of Intent indicated that states would play a central role in the planning process, and all partners have declared their desire to avoid the need to list Greater Sage-Grouse under the Endangered Species Act (ESA).

On May 4, 2018, the BLM released Draft Resource Management Plan Amendments (RMPA) and Environmental Impact Statements (EIS) for Oregon and six other western states that considered and analyzed the potential impacts of a No Action Alternative and a Management Alignment alternative. While all changes proposed in the Management Alignment alternatives were meant to enhance coordination with respective state plans, variations reflected the different approaches states are taking within their jurisdictions to conserve Greater Sage-Grouse and the BLM's determination that greater flexibility was needed to ensure that each state can manage the habitat within its borders for the particular needs of its landscapes and communities.

On December 7, 2018 the BLM released the Proposed Resource Management Plan Amendments and Final Environmental Impact Statements (Proposed RMPA/Final EISs) for a 30-day protest period (which was extended during the temporary lapse in Federal government funding), and a 60-day Governor's Consistency Review. The proposed plans built on the 2015 revisions and amendments to the BLM RMPs, as well as three years of on-the-ground experience with what is working to conserve sage-grouse habitat on public lands in support of healthy populations managed and conserved by the states.

Together, the amended plans retain the priority habitat management area designation for approximately 29.003 million acres of BLM-administered sagebrush-steppe, where the management priority is to exclude or avoid disturbance to sage-grouse and their habitat, and to minimize impacts to priority habitat management areas that cannot be avoided. Another 23.187 million acres retain identification as general habitat management area, where avoidance and minimization are applied flexibly, consistent with both local conditions and the state's science-based objectives for species management.

Including habitat in Montana, North Dakota, and South Dakota, a total of approximately 32.433 million surface acres will be managed as priority habitat across the Greater Sage-Grouse's range, while another approximately 25.589 million acres are designated general habitat. Trigger points remain in place for BLM-managed habitat to indicate when and where adaptive management responses are needed or required to address habitat and/or population declines in priority habitat management areas.

Finally, the amended plans clarify and formalize coordination between the BLM and respective states in applying compensatory mitigation measures to approved actions. These plans reflect the BLM's determination that the Federal Land Policy and Management Act of 1976 (FLPMA) does not explicitly mandate or authorize the BLM to require public land users to implement compensatory mitigation as a condition of obtaining authorization for the use of BLM-administered lands. The plans clarify that the BLM will consider compensatory mitigation only as a component of compliance with a state mitigation plan, program, or authority; other federal law; or when offered voluntarily by a project proponent. In Oregon, when the State of Oregon requires compensatory mitigation as a component of compliance with the State's mitigation plan, program, or authority, BLM Oregon will incorporate and enforce that compensatory mitigation as a condition of BLM Oregon-issued permits or authorizations.

The amended plans reinvigorate the Department of the Interior's commitment to collaborate with our neighbors in conserving sagebrush habitats and sage-grouse populations. Further the amended plans reflect the BLM's determination that greater flexibility for each state to manage Greater Sage-Grouse and sagebrush habitat will lead to improved outcomes for the species.

2. PLANNING AREA

The Oregon planning area included approximately 60,649 acres of lands administered by BLM Oregon located in three Oregon counties: Harney, Lake, and Malheur. The planning area is the geographic area within which the BLM Oregon will make decisions during a planning effort. Normally, a planning area boundary includes all lands regardless of jurisdiction. For this planning process the planning area included 15 Research Natural Areas (RNAs) administered by the BLM Oregon, identified as key RNAs in the 2015 Oregon Greater Sage-Grouse Record of Decision/Approved Resource Management Plan Amendment (ROD/ARMPA). Two of the RNAs discussed during this planning process (Foster Flat and Guano Creek-Sink Lakes) were closed to livestock grazing by the 1992 Three Rivers ROD/RMP and the 2003 Lakeview ROD/RMP, respectively. The 2015 Oregon Greater Sage-Grouse ROD/ARMPA left these RNAs closed to livestock grazing. The Foster Flat and Guano Creek-Sink Lakes RNAs were discussed in this planning process for analysis purposes and to provide context relative to the BLM Oregon's ability to meet the objectives identified in the Purpose and Need, Scope of Analysis described in Section 1.2 of the final Environmental Impact Statement. As described in the draft and final Environmental Impact Statements, the plan amendment did not propose to revisit or amend prior decisions to leave these two key RNAs closed to livestock grazing.

The decision area for this plan amendment process therefore includes only 21,959 acres in 13 key RNAs that were made unavailable to livestock grazing through the 2015 Oregon Greater Sage-Grouse ROD/ARMPA.

This 2019 Record of Decision and 2019 Approved Resource Management Plan Amendment do not establish any additional management for lands that are not identified as Greater Sage-Grouse habitat and do not establish any management direction for lands not administered by the BLM Oregon. BLM Oregon administered lands that are identified as Greater Sage-Grouse habitat management areas would continue to be managed according to the existing, underlying land use plans, including eight district RMPs as amended by the 2015 Oregon Greater Sage-Grouse ROD/ARMPA.

3. DECISION

The decision is hereby made to approve the 2019 Record of Decision and Oregon Greater Sage-Grouse Resource Management Plan Amendment as described in Section 3.1 below. This ROD and Approved Resource Management Plan Amendment become effective on the date this ROD is signed.

BLM Oregon prepared the 2019 Resource Management Plan Amendment under the authority of the FLPMA (43 United States Code [U.S.C.] 1701 et seq.) and other applicable laws. BLM Oregon prepared an EIS in compliance with the National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4347) as amended, and BLM planning regulations (43 CFR [Code of Federal Regulations] Part 1601 et seq.).

This plan will amend one specific decision contained in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA as well as the following Resource Management Plans (RMP).

- Andrews (2005)
- Baker (1989)
- Brothers/La Pine (1989)
- Lakeview (2003)
- Southeastern Oregon (2002)
- Steens (2005)
- Three Rivers (1992)
- Upper Deschutes (2005)

This 2019 Resource Management Plan Amendment retains the vast majority of the allocations, objectives, and management decisions in the above-mentioned plans, including the amendments made via the 2015 Oregon Greater Sage-Grouse ROD/ARMPA. All of the decisions made in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA remain in effect, with one exception: all or portions of the 13 key Research Natural Areas that were made unavailable to livestock grazing in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA are now available to livestock grazing.

Foster Flat and Guano Creek–Sink Lakes RNAs remain closed to livestock grazing per district RMP decisions made prior to the decisions made on the 2015 Oregon Greater Sage-Grouse ROD/ARMPA. These RNAs were left as closed to livestock grazing in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA and no decision or change is made in this plan amendment for these two RNAs.

3.1 Approved Management Decision and Plan Amendment

All or portions of 13 key Research Natural Areas (key RNAs) are available to livestock grazing, subject to applicable laws, regulations, policies, and BLM Oregon Resource Management Plan decisions. The 13 key RNAs available for livestock grazing are Black Canyon, Dry Creek Bench, East Fork Trout Creek, Fish Creek Rim, Foley Lake, Lake Ridge, Mahogany Ridge, North Ridge Bully Creek, Rahilly-Gravelly, South Bull Canyon, South Ridge Bully Creek, Spring Mountain, and Toppin Creek Butte. Changes to the 2015 Greater Sage-grouse Approved Resource Management Plan Amendment document resulting from this decision are provided in the following paragraphs.

Objective Livestock Grazing 2 is changed to:

Objective LG2: On BLM-managed lands, 12,105,581 acres will continue to be available for livestock grazing in Greater Sage-Grouse habitat. Table 2-6 is no longer applicable and is therefore deleted.

Management Direction Livestock Grazing 1 is changed to:

MD LG 1 is deleted.

Livestock grazing management in the 13 key RNAs returns to being governed by applicable district RMPs as amended by the 2015 Oregon Greater Sage-Grouse ROD/ARMPA goals, objectives, and management decisions.

Objective Special Designation 4 is changed to:

Objective SD 4: Manage the Foster Flat and Guano Creek–Sink Lakes RNAs as undisturbed baseline reference areas for the sagebrush plant communities they represent that are important for Greater Sage-Grouse. Minimize human disturbance in all 15 key RNAs, allowing natural ecological processes to proceed.

3.2 What the ROD and Approved Resource Management Plan Amendment Provide

The decision provided in this ROD and Resource Management Plan Amendment build upon the decisions contained in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA. This 2019 Resource Management Plan Amendment enhances consistency with the State of Oregon's Sage-Grouse Action Plan.

The decision in this 2019 Resource Management Plan Amendment affects only the availability of livestock grazing in 13 key Research Natural Areas as described in Section 3.1 above. All other decisions in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA remain unchanged.

Clarifications regarding compensatory mitigation described in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA are provided in Section 6 below.

3.3 What the ROD and Approved Resource Management Plan Amendment Do Not Provide

This 2019 Approved Resource Management Plan Amendment does not contain decisions for public lands outside of the 13 key Research Natural Areas identified in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA.

This 2019 Approved Resource Management Plan Amendment does not violate existing, valid rights nor does it contain decisions for mineral estates that are not administered by BLM Oregon. The 2019 Approved Resource Management Plan Amendment decisions for surface estate only apply to land administered by BLM Oregon. In addition, many decisions are not appropriate at this level of planning and are not included in this ROD, such as:

- Statutory requirements: The decision does not change the BLM Oregon's responsibility to comply with applicable laws, rules, and regulations.
- National policy: The decision does not change the BLM Oregon's obligation to conform to current or future national policy.
- Funding levels and budget allocations: These are determined annually at the national level and are beyond the control of State, District, or Field Offices.

Implementation decisions are management actions tied to a specific location. They generally constitute the BLM Oregon's final approval allowing on-the-ground actions to proceed and require appropriate site-specific planning and further National Environmental Policy Act analysis. Such decisions may be incorporated into implementation plans (activity or project plans) or may be stand-alone decisions. This Approved RMPA does not contain any implementation decisions. Implementation decisions and management actions that require additional, site-specific project planning will require further environmental analysis.

4. ALTERNATIVES CONSIDERED IN THE PROPOSED RMPA AND FINAL EIS

In the 2015 amendment process the BLM Oregon considered six alternatives, plus the Proposed Plan amendment alternatives. The 2018 planning process did not revisit every issue that BLM Oregon evaluated in 2015. Instead, BLM Oregon has addressed refinements to the 2015 Oregon Greater Sage-

Grouse ROD/ARMPA decisions, consistent with BLM’s purpose and need for action, including the BLM Oregon-specific scope of issues and analysis. Accordingly, this Resource Management Plan Amendment and associated Environmental Impact Statements (EIS) have as its foundation the comprehensive 2015 Oregon Final EIS and 2015 Oregon Greater Sage-Grouse ARMPA, and incorporated those documents by reference—including the entire range of alternatives evaluated through the 2015 planning process.

In the May 2018 Draft EIS BLM Oregon considered and analyzed in detail two alternatives, the No Action Alternative and the Management Alignment Alternative. In the 2018 Final EIS BLM Oregon carried forward the Management Alignment alternative as the Proposed Resource Management Plan Amendment based on external and internal review of the 2018 Draft EIS. Summaries of these Alternatives are provided in the subsections below.

In addition, in response to public comments on the 2018 Draft EIS, BLM Oregon considered additional alternatives. In addition to the two alternatives analyzed in detail (Proposed Plan Amendment and No Action Alternative¹), BLM Oregon considered three additional alternatives. These alternatives were developed to consider reducing economic impacts, reducing acreages of the key RNAs, and reducing the acreage unavailable to livestock grazing while still achieving the research purposes for which the key RNAs were made unavailable to livestock grazing in the 2015 Oregon Greater Sage-Grouse ROD/ARMPA. As described in the 2018 Proposed Resource Management Plan Amendment /Final EIS (section 2.2.2, pages 2-3 to 2-6), BLM Oregon dismissed these alternatives from detailed analysis because the alternatives were substantially the same as other alternatives analyzed in detail or the impacts would be substantially the same as the impacts of other alternatives analyzed in detail. The three alternatives considered, but not analyzed in detail in the 2018 Final EIS, included:

- reducing the size (acreage) of all 13 key RNAs unavailable to livestock grazing and adding a potential study area in the Steens Mountain Wilderness;
- making five of the key RNAs available to livestock grazing, leaving the other eight unavailable to livestock grazing, and adding a potential study area in the Steens Mountain Wilderness; and
- keeping the 13 key RNAs unavailable to livestock grazing, but reducing the size (acreage) of area unavailable to livestock grazing in five of the key RNAs, leaving the other eight the same size/acreage, and adding a potential study area in the Steens Mountain Wilderness.

4.1 No Action Alternative

Under the No Action Alternative, all or portions of 13 key Research Natural Areas in Oregon would have remained unavailable to livestock grazing as identified in the 2015 ARMPA. BLM Oregon would not have amended the existing 2015 ARMPA regarding the 13 key Research Natural Areas.

4.2 Management Alignment Alternative

The State of Oregon Greater Sage-Grouse Action Plan supports proper livestock grazing and recognizes the BLM’s authority to manage grazing on public lands. Livestock grazing would be available in all or portions of the 13 key Research Natural Areas in keeping with the districts’ RMPs and decisions issued

¹ The BLM’s DEIS and FEIS also incorporated by reference the range of alternatives evaluated by the EISs for the 2015 land use plan amendments and revisions addressing the conservation of Greater Sage-Grouse and its habitat.

prior to the 2015 ARMPA. This alternative would better support local communities and economies and would not change terms and conditions of existing grazing permits. Foster Flat and Guano Creek–Sink Lakes key Research Natural Areas would remain unavailable for livestock grazing, in keeping with the applicable district land use decisions made in RMPs prior to the 2015 Oregon Greater Sage-Grouse ROD/ARMPA.

4.3 Proposed Resource Management Plan Amendment

The Proposed Resource Management Plan Amendment in the 2018 Final EIS was a continuation of the Management Alignment Alternative and was carried forward based on internal review and comments received on the 2018 Draft EIS. Changes between the Management Alignment Alternative and the Proposed Resource Management Plan Amendment included the Greater Sage-Grouse Western Association of Fish and Wildlife Agencies Management Zone quantitative cumulative effects analysis. In addition, the Proposed Resource Management Plan Amendment/Final EIS clarified the Department of Interior and BLM’s policy and guidance on compensatory mitigation, and explained the relationship between those directives and the State of Oregon authorities, regulations, and action plan requirements related to compensatory mitigation. Section 6 below describes and updates the language related to compensatory mitigation in more detail.

4.4 Environmentally Preferred Alternative

Council on Environmental Quality regulations require that a Record of Decision (ROD) state which alternatives were considered to be “environmentally preferable” (40 CFR 1505.2(b)). Question 6A of the Council on Environmental Quality’s 40 most-asked questions regarding National Environmental Policy Act (NEPA) regulations defines that term to ordinarily mean the alternative which best protects, preserves, and enhances historic, cultural, and natural resources.

The BLM is required by FLPMA to manage the public lands for multiple use and sustained yield (see FLPMA § 302). And section 102(12) of FLPMA declares a policy of the United States that “the public lands be managed in a manner which recognizes the Nation’s need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (84 Stat. 1876, 30 U.S.C. 21a) as it pertains to the public lands.”

This land use planning effort builds off of the BLM’s 2015 plan revisions and amendments for the conservation of the Greater Sage-Grouse and its habitat and the Approved Resource Management Plan Amendment retains many of the management actions contained in the 2015 decisions, while adding some management flexibility and aligning the BLM’s conservation plan with the conservation measures of the expert State agency. As reflected in the analysis in the FEIS, the limited management flexibility offered by the alignment alternative and alignment with the State’s approach results in effects that are well understood and disclosed in BLM’s analysis of impacts on Greater Sage-Grouse and other resources in the planning area. As described in more detail below, the Approved Resource Management Plan Amendment will enhance cooperation and coordination with the State while reducing inconsistencies between the BLM’s land use plans and the State’s approach to protecting and conserving Greater Sage-Grouse. Harmonizing these efforts will improve the BLM’s and the State’s ability to marshal resources to conserve, enhance, and restore Greater Sage-Grouse habitat in an efficient and coordinated manner. Accordingly, neither alternative is “environmentally preferable” to the other as that term is defined in

Question 6A of CEQ's 40 most-asked questions regarding NEPA. Moreover, even if the No-Action Alternative were "environmentally preferable", neither FLPMA nor NEPA requires the BLM in this context to maximize the conservation of biological and other natural resources, and selection of the No Action Alternative would not achieve the BLM's Purpose and Need for Action to enhance cooperation and coordination with the State while reducing inconsistencies between the BLM's land use plans and the State's approach.

5. MANAGEMENT CONSIDERATIONS

5.1 Decision Rationale

The process to amend the 2015 Greater Sage-Grouse Approved Resource Management Plan Amendments (ARMPA) across the range of the species was initiated in October 2017 via a Notice of Intent published in the Federal Register, as described in Section 1. In response to the Notice of Intent the Governor of Oregon sent a letter to BLM Oregon indicating that a major plan amendment was not needed. Oregon's Governor noted that the existing 2015 Oregon Greater Sage-Grouse ARMPA, as a collaboratively built plan, had important consistencies with the State of Oregon's Greater Sage-Grouse conservation action plan, Executive Orders, statutes and regulations.

Through subsequent discussion, consultation and coordination with the State of Oregon, BLM Oregon determined that it would proceed with a narrowly focused amendment related to livestock grazing on 13 key Research Natural Areas (RNA) rather than a broader amendment to the many Goals, Objectives, and Management Directions contained in the 2015 Oregon Greater Sage-Grouse ARMPA that the State of Oregon had determined were consistent with the State's approach to management of Greater Sage-Grouse. BLM Oregon determined this re-examination of livestock grazing in the 13 key RNAs was necessary to address more specific economic impacts than was possible during the 2015 statewide planning process. That is, economic impact analysis conducted during the 2015 planning process included over 10 million acres of Greater Sage-Grouse habitat, which masked the economic impact to a limited set of operators who had livestock grazing permits in the 13 key RNAs.

BLM Oregon also decided to re-examine other questions related to the land use allocation decision making the key RNAs unavailable to livestock grazing. BLM Oregon's Purpose and Need, Scope of Analysis in the draft and final Environmental Impact Statements defined three major questions to address in the amendment process. The questions BLM Oregon determined needed assessment for the 13 key Research Natural Areas included:

1. Whether and how making areas unavailable to livestock grazing addresses specific threats to Greater Sage-Grouse and Greater Sage-Grouse habitat as identified in the U.S. Fish and Wildlife Service's (USFWS) Conservation Objectives Team (COT) Final Report (2013).
2. Whether the vegetation communities of interest in the key RNAs can be protected and studied with smaller areas of grazing exclusion and still meet the stated 2015 ROD/ARMPA purposes to:
 - a. Serve as areas for comparison for managed areas in the rest of the Greater Sage-Grouse habitat in the 2015 ROD/ARMPA
 - b. Function as areas for baseline vegetation monitoring for those specific plant communities with no management activities (i.e., succession is allowed to proceed).

3. Whether having the key RNAs available to grazing and managed under the previous district management plan provisions will preclude the BLM Oregon from achieving the research (or scientific study) purposes of the 2015 ROD/ARMPA.

In Section 4.5 of the 2018 Oregon FEIS, BLM Oregon concludes that “closing the key RNAs to livestock grazing would not address any threats to Greater Sage-Grouse habitat identified in the COT report (USFWS 2013) that may exist within the boundaries of the RNAs” (page 4-7).

As described in the 2013 COT Report, the 2015 Oregon Greater Sage-Grouse Final Environmental Impact Statement (EIS), and the 2018 Oregon Greater Sage-Grouse Final EIS, improper livestock grazing can be considered a threat to the Greater Sage-Grouse and its habitat. Improper grazing, defined as grazing practices that are inconsistent with local ecological conditions and result in degradation of habitat for local wildlife species, can have adverse effects on Greater Sage-Grouse and its habitat, and may work synergistically with other potential threats, such as invasive plants and wildfire, to increase adverse impacts (USFWS 2015).

The USFWS found that well-managed grazing practices can be compatible with sagebrush ecosystems and Greater Sage-Grouse persistence (USFWS 2015).

The impacts of both proper and improper livestock grazing are described in Section 4.5 (pages 4-6 to 4-9) and Section 4.9 (pages 4-16 to 4-18) of the November 2018 Final EIS. The 2018 Oregon Final EIS impact analyses considered the 2015 Final EIS impact analyses, with sections and page numbers noted and incorporated by reference. Section 4.9 of the 2018 Oregon Final EIS also notes that all activities and uses within Greater Sage-Grouse habitats must follow existing and current land health standards (Standards for Rangeland Health and Guidelines for Livestock Grazing Management, 1997). Section 4.5 of the 2018 Oregon Final EIS also states that the BLM Oregon will require changes to livestock grazing/management in the 13 key RNAs if a rangeland health assessment identifies livestock grazing as a causal factor in the failure to meet rangeland health standards. BLM Oregon may also require changes to livestock grazing/management for various reasons in accordance with its grazing regulations (43 CFR 4100 [2005]).

In its 2015 decision to not list Greater Sage-Grouse, the USFWS concluded that “although livestock grazing is widespread in the sagebrush ecosystem, and we expect some continued impacts from improper grazing at local scales, existing Federal regulations with full implementation, in combination with voluntary efforts on non-Federal rangelands are reducing the prevalence of improper grazing and its impacts to sage-grouse” (50 FR Part 17 page 59911). Properly managed livestock grazing is compatible with managing for Greater Sage-Grouse conservation outcomes and can be used to reduce fuel loads (Davies et al. 2010; Davies et al. 2011), to protect intact sagebrush habitat, and to increase habitat extent and continuity (Connelly et al. 2004).

The 2015 Oregon Greater Sage-Grouse ROD/ARMPA decision to make 13 key RNAs unavailable to livestock grazing was not therefore primarily intended to address a threat identified in the COT report (USFWS 2013) that may exist within the boundaries of the RNAs.

As stated in Section 4.5 (page 4-7) of the 2018 Oregon Final EIS, the Proposed Plan Amendment would result in 21,959 fewer undisturbed acres within Oregon available for additional research in plant

communities important to Greater Sage-Grouse to further determine the impact of livestock grazing on Greater Sage-Grouse and their habitats. The section goes on to further state that closing the 13 key RNAs to grazing would enhance research opportunities relating to the effects of grazing on Greater Sage-Grouse habitat, including the threat posed by “improper grazing” (page 4-7 and 8). Ungrazed RNAs can provide a baseline for the analysis of various grazing practices (Table 2-1 on page 2-8; pages 4-2 and 4-8). In addition, Section 4.5 (page 4-8) states that BLM Oregon determined in the 2015 Oregon Final EIS and ROD/ARMPA that the 13 RNAs identified for closure along with the 2 RNAs already closed to livestock grazing were likely the minimum number of sites and areas necessary to provide sufficient replication and support a coherent research plan that would provide data with the statistical power and sufficient scope of inference to extrapolate the results across all Greater Sage-Grouse habitat in eastern Oregon and potentially into western Idaho and northern Nevada. The primary research purpose for BLM Oregon’s closure would be to study whether livestock grazing has adverse, beneficial, or no impact on the availability of forbs and insects important to pre-laying hens and Greater Sage-Grouse chicks. BLM Oregon intended the closed areas to serve as controls for studying grazing impacts on the same plant communities outside of the closed areas.

In addition to the Proposed Plan Amendment alternative, BLM Oregon considered and described other approaches for potentially meeting the 2015 Oregon Greater Sage-Grouse ARMPA scientific purposes under which that plan designated the 13 key RNAs as being unavailable to livestock grazing and to reduce economic impacts to operators with livestock grazing permits within the 13 key RNAs. In section 2.2.2 (pages 2-3 to 2-6) of the 2018 Proposed Resource Management Plan Amendment/Final EIS, BLM Oregon describes alternatives that would have reduced the size (acreage) of the key RNAs unavailable to livestock grazing, would have allowed grazing on five of the key RNAs, or would have reduced the size (acreage) in five key RNAs that would be unavailable to livestock grazing.

Although likely at a smaller scale and therefore potentially of less statistical value, Districts retain the ability to individually work with operators to provide ungrazed controls for the identified research and to close RNAs within a District through District initiated RMP amendments or revisions. BLM Oregon also remains free to explore such studies outside the planning area of this amendment process (e.g., on other BLM-administered lands or collaboratively at national wildlife refuges) and through cooperative efforts with others (e.g., USFWS, university researchers).

Section 4.10 of the 2018 Oregon FEIS examined the economic impacts of making 13 key RNAs unavailable to livestock grazing. Specific operator information was not available to conduct a detailed quantitative analysis so a qualitative analysis was done. Most if not all operators with grazing permits in the key RNAs made unavailable to livestock grazing in the 2015 Oregon Greater Sage-Grouse ARMPA would eventually, when formally closed after the two year process required by BLM grazing regulations, see reductions in animal unit months and therefore an economic impact. BLM Oregon determined that some of the operators would be able to move animal unit months to other pastures of their permits without an actual reduction in active use or economic impact. However, in five of the key RNAs operators would not be able to move animal unit months to other pastures and would therefore be economically impacted. BLM Oregon considered whether reducing the acreage unavailable to livestock grazing in these five key RNAs would reduce the economic impact to the operators (see Section 2.2.2, page 2-5 of the 2018 Oregon Final EIS). BLM Oregon also considered making these five key RNAs available to livestock grazing (see Section 2.2.2, page 2-5 of the 2018 Oregon Final EIS), which would

have reduced or eliminated the economic impact to the livestock operators, but would not have met the research goals of the 2015 ARMPA.

Further, the 2015 decision to make 13 key RNAs unavailable to livestock grazing in the 2015 Oregon Greater Sage-Grouse ARMPA did not address a specific threat to Greater Sage-Grouse. Reducing economic impacts to livestock operators who graze in 5 of the 13 key RNAs would impact BLM Oregon's 2015 ARMPA research goals for those key RNAs. The 2018 Proposed Plan Amendment set aside the coordinated, comprehensive livestock research goals identified in the 2015 ARMPA to eliminate economic impacts to certain livestock operators with no additional threat to Greater Sage-Grouse. By selecting the 2018 Proposed Plan Amendment, the economic impacts to certain livestock operators are eliminated with no additional threat to Greater Sage-Grouse.

Over 350 species of plants and wildlife rely on sagebrush steppe ecosystems and coexist with Greater Sage-Grouse and may be similarly affected by development or disturbance threats that pose a risk to Greater Sage-Grouse habitats; however, nothing in the approved plan lessens the BLM's authority or responsibility to provide for the needs of special status species, including BLM Manual 6840, Special Status Species Management.

This 2018 planning process builds on the 2015 planning process and the BLM identified special status species as an issue for further consideration and analysis. The approved plan will continue to ensure that the BLM complies with its special status species policy, including the commitment to "implement measures to conserve species and their habitats... and promote their conservation and reduce the likelihood and need for such species to be listed pursuant to the ESA." (BLM Manual 6840, Special Status Species Management). In accordance with the Manual, the BLM will continue to undertake planning decisions, actions and authorizations "to minimize or eliminate threats affecting the status of [Greater Sage-Grouse] or to improve the condition of [Greater Sage-Grouse] habitat" across the planning area.

5.2 Future Implementation Actions

Both the 2018 draft and final Resource Management Plan Amendment/EISs identified a variety of Greater Sage-Grouse plan implementation level actions that need to occur, but were and are outside the scope of this 2018 BLM Oregon plan amendment process.

BLM Oregon has committed to continuing to work with the State, SageCon partnership, and other stakeholders as well as BLM Oregon districts to communicate and clarify the contents and implementation requirements of new and revised Instruction Memorandums as they apply to Greater Sage-Grouse.

As described below in Section 6, BLM Oregon is working with the State to develop a Memorandum of Agreement to guide coordination and implementation of the 2018 Greater Sage-Grouse Resource Management Plan Amendment compensatory mitigation language updates and clarifications. In addition, BLM Oregon will develop and issue a state-level Instruction Memorandum to guide District and Field offices on how to implement the Memorandum of Agreement guided by Washington Office Instruction Memorandum No. 2019-018 (or future replacements) on compensatory mitigation. Additional Instruction Memorandums may be developed if BLM Oregon determines state-level policy is needed to provide

additional guidance on implementing plan provisions consistent with current, revised, or new national, departmental, or agency law, regulation or policy.

BLM Oregon also identified a variety of needed plan maintenance actions. Future planning needs include:

- Resolve and clarify discrepancy in noise restrictions in different places of the 2015 ROD/ARMPA
- Clarify use of lek buffers in analysis and implementation actions
- Clarify Appendix J language on longevity of trigger responses
- Clarify reclamation language in required design features (RDFs)

BLM Oregon also identified training and educational needs and opportunities. These topics are best addressed outside of plan amendment or maintenance, as they do not reflect planning decisions or policy. Topics identified for future and continued discussions with partners and stakeholders include:

- reserve common allotments (grass banks) to promote resilience and viability for livestock economies and habitat restoration priorities, and
- waivers, exceptions, and modifications for development actions within priority habitat.

6. MITIGATION

The 2015 Greater Sage-Grouse Approved Resource Management Plan Amendment included a number of Goals, Objectives, and Management Directions directed at providing a net conservation gain to Greater Sage-Grouse, including mitigation and compensatory mitigation. The net conservation gain objective of the 2015 Oregon Greater Sage-Grouse ARMPA has not been amended through this 2018 planning process. However, both Department of Interior and BLM guidance and policy related to compensatory mitigation has changed since 2015. The Oregon 2018 Proposed Resource Management Plan Amendment/Final EIS included language intended to clarify and update BLM Oregon's 2015 Greater Sage-Grouse ARMPA compensatory mitigation language and align it with current department and agency policy under the FLPMA. The compensatory mitigation language contained in this 2019 Record of Decision and Approved Resource Management Plan Amendment supersedes and replaces the clarification language of the Proposed Resource Management Plan Amendment/Final EIS.

BLM Oregon will implement the Greater Sage-Grouse plan amendments, including compensatory mitigation, consistent with law, regulation, and department and agency policy. BLM Instruction Memorandum 2019-018 describes the BLM's FLPMA authorities with respect to compensatory mitigation, including a description of how BLM and State authorities interact. BLM Instruction Memorandum No. 2019-018 articulates current policy that FLPMA does not explicitly mandate or authorize the BLM to itself require public land users to implement compensatory mitigation as a condition of obtaining authorization for the use of the public lands. However, BLM Oregon may require the implementation of other forms of mitigation, as appropriate. BLM is committed to meeting its statutory obligations to prevent unnecessary or undue degradation and protecting resources by incorporating onsite mitigation measures into its use authorizations prior to approval. In addition, when issuing rights-of-way, BLM is required to include terms and conditions in its grant that will, among other

things, “minimize damage to scenic and esthetic values and fish and wildlife habitat and otherwise protect the environment.” 43 U.S.C. 1765(a)(ii). Moreover, project proponents seeking BLM authorizations are free to voluntarily incorporate compensatory mitigation measures in proposals. BLM typically analyzes these mitigation measures, as part of a proposed action, as part of BLM’s compliance with the National Environmental Policy Act (NEPA).

BLM Oregon will continue to apply the mitigation hierarchy as described in the Council on Environmental Quality regulations at 40 CFR 1508.20 to its NEPA analyses. BLM Oregon will focus on avoiding, minimizing, rectifying, and reducing impacts over time. BLM Oregon application of compensatory mitigation, which involves replacing or providing substitute resources for the impacts (including payments to the state mitigation program to fund such work, potentially offsite), will occur only when: voluntarily offered by a proponent; required by a law other than FLPMA; or, when the appropriate state agency, through coordination with BLM Oregon, determines a state regulation, policy, or program requires compensatory mitigation.

In 2015, in exercise of its jurisdiction over wildlife, Oregon developed mitigation authorities, policies, and programs relevant to Greater Sage-Grouse, including the application of compensatory mitigation to residual project impacts. BLM’s compensatory mitigation policy does not abrogate, preempt, or undermine State of Oregon policies that take a different approach in accordance with state law. While current agency policy does not regard federal law as authorizing BLM to itself apply compensatory mitigation as a condition of its permits or use authorizations, it also does not regard federal law as preempting or abrogating a state’s application of state compensatory mitigation policy and programs to federal public land permit or use authorizations, provided that state-directed compensatory mitigation does not conflict with federal law. BLM Oregon remains committed to close coordination and, so long as not in conflict with federal law, consistency with the State of Oregon regarding application of the mitigation hierarchy in advance of and as part of BLM’s use authorizations, permits, or the agency’s own advancement of projects affecting Greater Sage-Grouse and its habitat on federal public lands. In this context, where the State of Oregon, through coordination with BLM Oregon, determines the State’s mitigation plan, program, or authority would require compensatory mitigation the BLM Oregon will incorporate and enforce that state-directed compensatory mitigation as a condition of BLM Oregon-issued permits or authorizations.

In addition to incorporating and enforcing the State's required mitigation, BLM Oregon will incorporate, among other BLM information and analysis, State information and project impact analysis to Greater Sage-Grouse and other wildlife into the BLM’s NEPA analysis of projects proposed or undertaken on federal public land. This includes incorporation of habitat baseline and impact quantification and associated mitigation requirements and recommendations. In addition, BLM Oregon will analyze and disclose the effects of compensating for residual effects per state recommendations versus not doing so in its project-specific NEPA documentation for project proposals on BLM land. Further, implementation and effectiveness of mitigation, including compensatory mitigation, applied at multiple scales will be monitored in close coordination with Oregon Department of Fish and Wildlife, as outlined in the 2015 Oregon Greater Sage-Grouse ARMPA. The BLM remains committed to achieving the planning-level management goals and objectives identified in this ROD and the 2015 ARMPA by ensuring Greater Sage-Grouse habitat impacts are addressed through implementing mitigating actions consistent with the governing RMP.

BLM Oregon will continue to coordinate with the State of Oregon with respect to mitigation, through the development of a Memorandum of Agreement to ensure the continued advancement of a coordinated approach to mitigation across Oregon's Greater Sage-Grouse habitat, compliance with the State's program for compensatory mitigation, and meeting BLM Oregon's net conservation gain objective and the State of Oregon's net conservation benefit standard. The Memorandum of Agreement will document BLM Oregon's commitment to coordinating its mitigation approach with the State of Oregon, including through conducting pre-application meetings with appropriate State entities, working with the State to apply the mitigation hierarchy, and using, among other methods, the State's habitat quantification and development impact analysis methods to ensure consistent application of State policies, laws, and programs as part of project permitting on BLM Oregon-administered lands. In addition, BLM Oregon is committed to working with the State, through the development of a BLM Oregon state-level Instructional Memorandum, to identify and clarify the implementation procedures described in Appendix F of the 2015 Oregon Greater Sage-Grouse ARMPA.

7. PLAN MONITORING

Plan monitoring commitments were made in the 2015 Oregon Greater Sage-Grouse ARMPA and were not changed in this amendment. Plan monitoring will continue as explained in the 2015 Oregon Greater Sage-Grouse ARMPA Appendix D. Data and other information on Greater Sage-Grouse habitat conditions and population status collected at multiple scales in cooperation with Oregon Department of Fish and Wildlife and other relevant State and Federal agencies will be used to determine whether the objective of net conservation gain is being achieved.

8. PUBLIC INVOLVEMENT, CONSULTATION, AND COORDINATION

8.1 Public Involvement

The public involvement process, consultation, and coordination conducted for the Resource Management Plan Amendment are described in Chapter 5 of the Proposed Resource Management Plan Amendment and Final EIS. As required by regulation, public scoping meetings were conducted following the publication of the Notice of Intent to prepare an EIS in the *Federal Register* on October 11, 2017.

A Notice of Availability (NOA) for the Draft Resource Management Plan Amendment/EIS was published in the *Federal Register* on May 4, 2018. The NOA initiated a 90-day public comment period. BLM Oregon held public comment open houses for the Draft Resource Management Plan Amendment/EIS on June 27, 2018 in Ontario, Oregon, and June 29, 2018, in Lakeview, Oregon. Both meetings were from 5:00 to 7:00 p.m. The comments received on the Draft RMPA and EIS and BLM Oregon's responses were summarized in Appendix C of the 2018 Proposed Resource Management Plan Amendment and Final EIS.

The NOA for the 2018 Proposed RMPA and Final EIS was published on December 10, 2018, initiating a 30-day public protest period and a 60-day Governor's Consistency Review period. The 30-day protest period ended on January 15, 2019. Eleven protest letters on the BLM Oregon 2018 Proposed Resource Management Plan Amendment were received. The 60-day Oregon Governor's consistency review period ended on February 5, 2019.

8.2 Protest Resolution

There were a number of protest points raised by the 12 protest letters received. Several of the protest letters were signed by multiple individuals or organizations. Protest points raised in the letters indicated that BLM Oregon failed to:

- comply with various provisions of the FLPMA, including special area designations, consistency with state and local plans, data and science, unnecessary and undue degradation, and in general;
- comply with various provisions of the National Environmental Policy Act (NEPA), including those relating to public participation and cooperating agency status, data and best available science, impact analysis (general, grazing, oil and gas, socioeconomics, other), cumulative effects, mitigation, purpose and need, range of alternatives, response to public comments, tiering, and supplementation;
- consult with the US Fish and Wildlife Service under Section 7 of the Endangered Species Act; and
- comply with other laws, such as the Taylor Grazing Act.

Five of the protests letters were dismissed due to a lack of standing, containing only comments not protest points, or containing no relevant issues.

The remaining seven protest letters contained both comments as well as the protest points outlined above. All protest points were considered by the BLM Washington Office, Office of the Director, and included in a Protest Resolution Report for the Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment/Final EIS (March 2019). All protest points were denied as described in the Protest Resolution Report.

8.3 Consultation and Coordination

Cooperating Agency Status

The BLM Oregon collaborated with numerous agencies, municipalities, and Tribes throughout the preparation of this Approved Resource Management Plan Amendment. The BLM Oregon outreach efforts and collaboration with cooperating agencies are described in Chapter 5 of the Proposed Resource Management Plan Amendment and Final EIS.

Six agencies accepted the offer to participate in the planning process as cooperating agencies, with five signing memorandums of understanding formalizing the cooperating agency relationship. BLM Oregon invited the cooperating agencies to participate in developing and reviewing the alternatives for the Resource Management Plan Amendment and EIS and to provide data and other information related to their agency responsibilities, goals, mandates, and expertise.

Governor's Consistency Review

The BLM's planning regulations require that Resource Management Plans be "consistent with officially approved or adopted resource-related plans, and the policies and procedures contained therein, of other Federal agencies, State and local governments, and Indian tribes, so long as the guidance and resource

management plans also are consistent with the purposes, policies, and programs of Federal laws and regulations applicable to public lands” (43 CFR 1610.3-2(a)).

The general requirement in the FLPMA and planning regulations is to coordinate the resource management planning process with plans of other agencies, States, and local governments to the extent consistent with law (see FLPMA Section 202(c)(9) and 43 CFR 1610.3-1(a)) and the respective duties to be consistent with both officially approved or adopted plans (to the extent those plans are consistent with Federal law or to the maximum extent practical; see 43 CFR 1610.3-2(a)(b)). In accordance with the FLPMA, BLM Oregon was aware of and gave consideration to State, local, and tribal land use plans and provided meaningful public involvement throughout the development of the Proposed Resource Management Plan Amendments/Final EISs.

BLM Oregon is aware that there are specific State laws and local plans relevant to aspects of public land management that are separate and independent of Federal law. However, BLM Oregon is bound by Federal law; as a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA and its implementing regulations require that the BLM’s RMPs be consistent with officially approved State and local plans only if those plans are consistent with the purposes, policies, and programs of Federal laws and regulations applicable to public lands.

Where officially approved State and local plans or policies and programs conflict with the purposes, policies, and programs of Federal laws and regulations applicable to public lands, there will be an inconsistency that cannot be resolved. With respect to officially approved State and local policies and programs (as opposed to plans), this consistency provision applies only to the maximum extent practical. While county and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to State or county plans, planning processes, policies, or planning stipulations.

The 60-day Governor’s consistency review period ended on February 5, 2019. The Governor of Oregon submitted a letter to the BLM Oregon State Director, asserting some inconsistencies between BLM Oregon’s Proposed Resource Management Plan Amendment and the State’s resource-related plans, policies, and procedures, as well as other concerns that they had with BLM Oregon’s proposed planning document.

On March 8, 2019, the BLM Oregon State Director notified the Governor of Oregon that the State’s recommendations were accepted. BLM Oregon added language in Section 6 to more specifically acknowledge the State’s authority to require compensatory mitigation under State authorities, policies, and programs for Greater Sage-Grouse and that, where applicable, BLM Oregon would incorporate and enforce State required compensatory mitigation in BLM Oregon authorizations. The Governor was given 30 days to appeal the BLM Oregon State Director’s decisions to the BLM Director per BLM planning regulations at 43 CFR 1610.3-2(e).

Native American Consultation

In November 2017, the BLM mailed letters to the eleven Tribes identified in Table 5-1 of the Proposed Resource Management Plan Amendment and Final EIS, inviting them to enter into consultation on the planning amendment process. Subsequently these eleven Tribes were also invited to participate as a

National Environmental Policy Act Cooperating Agency for the plan amendment effort. None of the eleven Tribes formally accepted the BLM Oregon's invitation to be a Cooperating Agency. However, BLM Oregon provided the eleven Tribes the same opportunity to review and comment on the preliminary draft Resource Management Plan Amendment/EIS as was provided to the Cooperating Agencies. The eleven Tribes were also notified and provided the opportunity to review and comment on the 2018 Draft Resource Management Plan Amendment/EIS and the 2018 Proposed Resource Management Plan Amendment/Final EIS on the same time schedule as the Cooperating Agencies and general public (see Public Involvement section above).

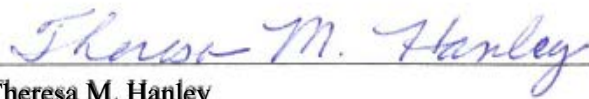
9. AVAILABILITY OF THE ROD AND APPROVED RMPA

Copies of the Oregon ROD and the Approved Resource Management Plan Amendment may be obtained by viewing or downloading the document from the BLM website located at <https://goo.gl/4CNtH8>.

10. APPROVAL

It is the decision of the Bureau of Land Management to approve the Resource Management Plan Amendment for Oregon as described in this Record of Decision. The Proposed Plan Amendment and related Final Environmental Impact Statements were published via ePlanning on December 7, 2018, and in the Federal Register (83 FR 63524) on December 10, 2018. The BLM Director has resolved all protests and, in accordance with BLM regulations 43 CFR 1610.5-2, the protest resolutions represent the final decision of the Department of the Interior.

I have considered how the alternatives analyzed in the Proposed Resource Management Plan Amendment and final Environmental Impact Statement meet the Purpose and Need, Scope of Analysis; the associated environmental impacts, and public input. Based on these considerations, I approve the 2019 Oregon Greater Sage-Grouse Resource Management Plan Amendment in this Record of Decision. This Record of Decision is effective immediately.



Theresa M. Hanley
Acting State Director, BLM Oregon/Washington

3-15-2019
Date

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