

Plan Element	2015 Plans	2019 Plans <sup>1</sup>	FEIS Analyses of Change
Sagebrush Focal Areas	<ul style="list-style-type: none"> <li>Included in all states but CO, ND, SD.</li> </ul>	<ul style="list-style-type: none"> <li><b>SFA designation eliminated in all states but OR.</b> As a result, 8.9 million acres lose the following protections: (1) recommendation for hardrock mineral withdrawal; (2) non-waivable NSO stipulation for oil and gas dev't; (3) prioritization for grazing permit reviews, compliance checks, post-fire treatments. ID FEIS at App-2-3; NV/CA ROD at 2-13; UT ROD at 38; WY FEIS at A-12.</li> </ul>	<ul style="list-style-type: none"> <li>“The removal of SFA designations would have no measurable effect on the conservation of Greater Sage-Grouse in Idaho because the Management Direction proposed for PHMA would remain in place and continue to protect Greater Sage-Grouse habitat.” ID FEIS at 4-10; <i>see also</i> CO FEIS at 4-13; NV/CA FEIS at 4-12; UT FEIS at 4-12, 4-42 to 4-42; WY FEIS at 4-9 to 4-10.</li> </ul>
Compensatory mitigation & Net Conservation Gain standard	<ul style="list-style-type: none"> <li>All plans required off-site compensation for unavoidable impacts to birds or habitat as part of the “mitigation hierarchy” (avoidance, minimization, and compensatory mitigation)</li> <li>BLM must require mitigation that achieves a net conservation gain to the species</li> </ul>	<ul style="list-style-type: none"> <li><b>All plans prohibit BLM from requiring compensatory mitigation.</b> Project proponents can volunteer compensatory mitigation or states can require.</li> <li><b>CO, ID, NV, UT, WY also downgrade the mitigation standard</b> from a “net conservation gain” to a “no net loss” (or no clear standard at all). CO ROD at 2-4; ID ROD at 2-13; ID FEIS at App-2-13 to 2-14; NV/CA ROD at 2-14, 2-41 to 2-43; OR ROD at 1-4; UT ROD at 38–42; WY FEIS at A-7 to A-8.</li> <li><u>UT</u>: avoidance, minimization mitigation only required in PHMA (formerly all habitat). UT ROD at 38, 51.</li> </ul>	<ul style="list-style-type: none"> <li>“This clarification simply aligns the Proposed Plan Amendment with BLM policy. . . . Any analysis of compensatory mitigation relating to future projects is speculative at this level of land use planning. . . . However, the effects of the changes to compensatory mitigation in the Proposed Plan will be nominal, in part, because the BLM will continue to ensure consistency of its actions and authorizations with the land use planning level goals and objectives of the Proposed Plans.” ID FEIS at 4-4; <i>see also</i> CO FEIS at 4-8; NV/CA FEIS at 4-14; OR FEIS at 4-21 to 4-22; UT FEIS at 4-18; WY FEIS at 4-14.</li> <li>Changing the mitigation standard “would reduce the amount of habitat that would be restored, improved, or protected by the difference between a net gain and a no net loss. . . . It is not possible to state how much benefit would be [lost]. . . . The acres of habitat not restored because of the reduction in the mitigation standard from net gain to no net loss would be much less than one percent of the vegetation treatments completed each year.” ID FEIS Appx. 1 at 4-15 to 4-16; <i>see also</i> NV/CA FEIS at 4-13 to 4-15; UT FEIS at 4-17 to 4-19; WY FEIS at 4-14 to 4-15.</li> <li>No environmental analysis of applying mitigation only in Utah PHMA.</li> </ul>

<sup>1</sup> Citations are provided to the FEIS only where the state ROD lacks a comparison (using underlining and strikethroughs) of the 2015 and 2019 language.

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Lek buffers	<ul style="list-style-type: none"> <li>Required in all states; distances based on USGS report</li> </ul>	<ul style="list-style-type: none"> <li><b>Buffer requirements shortened or eliminated in most states</b></li> <li><u>CO</u>: removes prohibition on new leasing 1 mile from active leks (now open subject to NSO subject to exception, modification, waiver). CO ROD at 2-15.</li> <li><u>UT, CO, NV/CA</u>: replaced language that BLM “will apply” buffers with commitment only to “evaluate” or “assess” buffers. CO ROD at 2-3; NV/CA ROD at 2-9; UT ROD at 47.</li> <li><u>ID</u>: (1) buffer distances reduced in IHMA, GHMA to USGS minimums; (2) new buffer exceptions; (3) eliminate buffers for vegetation treatment projects. ID FEIS at App-2-16 to 2-19.</li> <li><u>NV/CA</u>: (1) switches to lower end of buffers from Manier (as opposed to USGS); (2) allows exceptions during NEPA process; (3) allows line officers to shorten, extend, or waive seasonal buffer restrictions. NV/CA ROD at 2-11.</li> <li><u>UT</u>: 5-mile wind energy buffer now discretionary. UT ROD at 53, 90.</li> <li><u>WY</u>: expands circumstances in which BLM officers may grant exceptions to lek buffers, including 2-mile buffer during breeding, nesting, brood-rearing. WY FEIS at A-10.</li> </ul>	<ul style="list-style-type: none"> <li><u>CO</u>: “Although the additional acres would be available to leasing, their impact on Greater Sage-Grouse would be similar to the No-Action Alternative. This is because surface disturbance, fragmentation, and indirect habitat loss would not be expected to increase due to restrictions on surface disturbance.” CO FEIS at 4-5.</li> <li>No environmental analysis of change from “apply” buffers to “evaluate” buffers in any FEIS.</li> <li><u>ID</u>: “The reduction of buffers in IHMA would not result in increased development around every or even most leks because disturbance in BLM HMAs is limited and not the major threat to Greater Sage-Grouse habitat, however where development occurs nearer than the buffers identified in the No Action those leks would be at an increased risk of being abandoned.” Idaho FEIS Appx. 1 at 4-12. “Overall, the impacts of the changes to lek buffers . . . are not quite as protective as those in the No-Action Alternative.” <i>Id.</i> at 4-3.</li> <li><u>NV</u>: “The criteria established for modifying or removing seasonal timing restrictions has been revised . . . . Due to the fact that it would be speculative to anticipate at the land use planning level how often and when this exception would be pursued on a project-by-project basis, impacts would be more appropriate at the project scale.” NV FEIS at 4-15. No environmental analysis of (1) or (2).</li> <li><u>UT</u>: “Constructing transmission lines above-ground could increase predator perches, which may lead to increased take of Greater Sage-Grouse and their nests; however, impacts of predator perches would be minimized by conforming [to other plan provisions] . . . . Constructing transmission lines above the ground could also maintain more habitat than the burial of lines.” UT FEIS at 4-23.</li> <li><u>WY</u>: No environmental analysis of broader exception.</li> </ul>

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Disturbance and Density Caps	<ul style="list-style-type: none"> <li>Included in all states</li> <li>Most states: 3% project-level and total disturbance cap; density cap of 1 energy/mining project per 640 acres (oil and gas; coal; wind; solar; geothermal; other mining)</li> <li><u>Wyoming</u>: 5%</li> <li><u>Montana</u>: option to move to 5%</li> </ul>	<ul style="list-style-type: none"> <li><b>Eliminated or weakened in ID, UT, NV/CA</b></li> <li><u>ID</u>: removes 3% project-level disturbance cap <u>and</u> eliminate density cap of 1 energy, mining facility per 640 acres. ID FEIS at App-2-4 to 2-6.</li> <li><u>UT</u>: Allows exceedances of 3% disturbance cap and 1/640 acre density cap in non-habitat or where project will improve habitat. UT ROD at 42–46.</li> <li><u>NV/CA</u>: disturbance cap can be exceeded under more circumstances (“allocation exception” criteria); USFWS concurrence no longer required. NV ROD at 2-7 to 2-8 (allocation exception criteria at NV ROD at 2-12 to 2-13).</li> </ul>	<ul style="list-style-type: none"> <li><u>ID</u>: “Removal of the 3 percent project level disturbance cap would allow BLM to intentionally cluster developments within areas already degraded. . . . Some areas . . . may be further developed even though compensatory mitigation would offset those impacts. . . . Removal of the one energy or mining facility per 640 acres on average density cap would have little effect on Greater Sage-Grouse conservation . . . because Idaho has limited energy or mining development in Sage-grouse habitat . . . Additionally, there are restrictions on where and how energy facilities and salable mineral mining facilities are developed.” ID FEIS Appx. 1 at 4-10 to 11.</li> <li><u>UT</u>: “The ability to exceed the disturbance and density caps could result in loss and degradation of site-specific Greater Sage-Grouse habitat and impacts on local grouse populations. . . . [H]owever, exceedances to the caps would only be allowed if site-level analysis indicates the project . . . will improve the condition of Greater Sage-Grouse habitat. There is a risk that allowing this exceedance could result in the loss of a specific type of habitat that mitigation may not address[.]” UT FEIS at 4-17.</li> </ul>
Required Design Features (RDFs)	<ul style="list-style-type: none"> <li>All states apply a suite of uniform Required Design Features (RDFs) to mitigate adverse impacts. Applicable RDFs are required for all projects in PHMA and GHMA.</li> </ul>	<ul style="list-style-type: none"> <li><b>Partially eliminated or weakened in ID, UT, WY</b></li> <li><u>ID, UT</u>: RDFs no longer mandatory in GHMA. ID FEIS at App-2-8; UT ROD at ii.</li> <li><u>WY</u>: replaces RDFs “are required” with RDFs “can be applied.” WY FEIS at B-1.</li> <li><u>UT</u>: eliminates requirement of burying transmission, power lines in PHMA. UT ROD at 93.</li> </ul>	<ul style="list-style-type: none"> <li><u>ID</u>: “Removal of the requirement to apply RDFs and buffers in existing Greater Sage-Grouse habitat outside of designated habitat management areas would reduce protections to Greater Sage-Grouse and its habitat; however, PHMA and IHMA designations were designed to protect approximately 90 percent of occupied Greater Sage-Grouse leks. . . . This action is not expected to have any measurable population level effects to Greater Sage-Grouse in Idaho.” ID FEIS Appx. 1 at 4-8 to 4-9; <i>see also</i> UT FEIS at 4-23.</li> <li><u>WY</u>: No environmental analysis of change.</li> <li><u>UT</u>: “This change in management could result in both positive and negative impacts on Greater Sage-Grouse, depending on threats in local populations.” UT FEIS at 4-23.</li> </ul>

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General Habitat Management Areas (GHMA)	<ul style="list-style-type: none"> <li>All plans include GHMA (or equivalent)</li> </ul>	<ul style="list-style-type: none"> <li><b>GHMA designation entirely eliminated in UT (502,500 acres)</b>, along with corresponding buffers, RDFs, disturbance caps, seasonal restrictions, mitigation requirements. UT ROD at 36, 49-51, 82, 87, 88, 97</li> </ul>	<ul style="list-style-type: none"> <li><u>UT</u>: “[T]he impacts from the two alternatives would be the same in the long term, though the Proposed Plan Amendment could likely accelerate the effect on resources in the former GHMA. This is because it incentivizes development in [GHMA] over PHMA. . . . [T]here would be no significant effect of accelerating the impacts on the small populations in former GHMA that contain 5 percent of Utah’s Greater Sage-Grouse populations and just 0.25 percent of the populations range-wide. In addition, the Proposed Plan Amendment provides that the BLM would replace occupied habitat outside PHMA that is lost to development by creating or improving habitat inside PHMA.” UT FEIS at 4-20 to 4-21, 4-48.</li> </ul>
Adaptive management (soft and hard triggers)	<ul style="list-style-type: none"> <li>Plans all include “hard” and “soft” triggers requiring BLM to take corrective action when monitoring data shows that sage-grouse populations fall below specified thresholds.</li> </ul>	<ul style="list-style-type: none"> <li><u>NV/CA</u>: replaces hard-wired changes with warning system; easier to remove protections; trigger applied only at lek cluster scale, allowing declines in individual leks. NV/CA FEIS at Appx. D.</li> <li><u>UT</u>: lengthens timeframe for management response to hard trigger; new qualifications on when corrective strategies must be implemented; easier to remove protections. UT ROD at 54–56.</li> <li><u>WY</u>: “The Adaptive Management Working Group (AMWG) would define a process to review and reverse adaptive management actions once the identified causal factor is resolved.” WY FEIS at 2-18.</li> </ul>	<ul style="list-style-type: none"> <li><u>NV/CA</u>: “Habitat triggers have been replaced with a system of adaptive management warnings related to fire risk, wildland fire, anthropogenic and natural disturbances. If these warnings justify a response, this would be considered an adaptive management habitat trigger. Impacts on Greater Sage-Grouse and its habitat from this change to the adaptive management strategy would be beneficial, providing the ability to detect declining populations and/or habitat and change management on the ground with other Federal, state, and local partners.” NV/CA FEIS at 4-13.</li> <li><u>UT</u>: “[N]o additional analysis is necessary.” UT FEIS at 4-15.</li> <li><u>WY</u>: “The only change for adaptive management would be at the implementation level, when the AMWG identifies a process for returning to previous management. The impacts associated with returning to previous management would be the same as those identified in the final EISs for the 2014 and 2015 proposed land use plan amendments and revisions.” WY FEIS at 4-14.</li> </ul>

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<p>Prioritizing oil and gas leasing, development outside habitat</p>	<ul style="list-style-type: none"> <li>All states require BLM to prioritize oil and gas leasing and development outside of PHMA and GHMA.</li> </ul>	<ul style="list-style-type: none"> <li><b>Partially or totally eliminated in ID, UT, NV/CA, and WY</b></li> <li><u>UT, NV/CA</u>: eliminates prioritization requirement. UT ROD at 78; NV/CA at 2-32.</li> </ul> <p><u>WY</u>: removes prioritization requirement from GHMAs. WY FEIS at A-3.</p>	<ul style="list-style-type: none"> <li><u>WY</u>: Removal of prioritization has “the potential for locally adverse impacts on habitat in GHMA. This would be a result of potentially concentrating development in the GHMA or non-core areas; however, locally adverse impacts would not be likely to affect the conservation of Greater Sage-Grouse in Wyoming.” WY FEIS at 4-16.</li> </ul> <p><u>UT</u>: “At most, the prioritization objective could potentially result in temporarily deferring a parcel in PHMA from leasing to a later sale, but only in instances of large lease sales where staff capacity would be incapable of analyzing all the nominated parcels. Because the mineral leasing prioritization objective provides no certain or durable protection to PHMA, its removal would not increase threats, since the no surface occupancy stipulation is still in effect.” UT FEIS at 4-22.</p>
<p>No surface occupancy (NSO) stipulation</p>	<ul style="list-style-type: none"> <li>Most plans impose NSO stipulation in PHMA without waivers, exceptions and modifications (WEMs); where WEMs allowed, requires unanimous consent of BLM, state wildlife agencies, and U.S. Fish &amp; Wildlife Service (FWS)</li> </ul>	<ul style="list-style-type: none"> <li><b>Many more loopholes</b></li> <li><u>ID, NV/CA, UT</u>: allow waivers, exceptions, and modifications of NSO for more reasons <u>and</u> eliminate FWS consultation requirement. ID ROD at App-2-7 to App-2-8; NV/CA ROD at 2-32 to 2-33; UT ROD at 79-81;</li> <li><u>CO</u>: now allow waivers, exceptions, modification to NSO stipulation. CO ROD at 2-16 and G-4 to G-7.</li> <li><u>UT</u>: allows operators to place infrastructure (e.g., roads, pipelines, power lines) in PHMA without adhering to the NSO stipulation. UT ROD at 80.</li> </ul>	<ul style="list-style-type: none"> <li>“While allowing the possibility for an exception introduces the potential for an impact . . . , the criteria that must be met prior to approving an exception would either result in the exception not being granted, or in subsequent development having a low potential for impacts. Further, if the exception to the NSO stipulation is granted, and subsequent development would be subject to other minimization measures.” UT FEIS at 4-19; <i>see also</i> ID FEIS at 4-13; NV/CA FEIS at 4-11.</li> <li><u>CO</u>: “[N]o impact on Greater Sage-Grouse or Greater Sage-Grouse habitat would occur” due to availability of waivers, exceptions, and modifications. CO FEIS at 4-5.</li> <li><u>UT</u>: “[The] modification to the NSO stipulation [] could result in some site-specific impacts on Greater Sage-Grouse or their habitat. . . . The construction of such associated infrastructure would remove vegetation associated with habitat, increase predation opportunities on Greater Sage-Grouse and potentially displace birds.” UT FEIS at 4-19 to 4-20.</li> </ul>



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Habitat objectives / Livestock grazing	<ul style="list-style-type: none"> <li>• <b>Threshold and Response requirement:</b> NEPA analysis for grazing permits/lease renewals within SFA and PHMA must include specific management thresholds based on Greater Sage-Grouse Habitat Objectives, and “responses” for when thresholds are exceeded</li> </ul>	<ul style="list-style-type: none"> <li>• <b>ID, UT, WY eliminate requirement that BLM proactively impose thresholds/ responses</b> to protect sage-grouse during permit renewals, now requiring management changes only after habitat assessment identifies problem. ID FEIS at App-2-12 to 2-13; UT ROD at 72-73; WY FEIS at A-22.</li> <li>• <b>UT, WY:</b> Weaken requirement that existing grazing-related infrastructure be evaluated and modified. UT ROD at 74, 75; WY FEIS at A-24</li> <li>• <b>ID, WY, UT:</b> Remove requirements to prioritize permit renewals and/or field checks for PHMA. WY FEIS at A-22; ID FEIS at App-2-12; UT ROD at 71.</li> <li>• <b>UT:</b> Eliminates other restrictions including: emergency measures during drought; consideration of permit retirements; restrictions on new livestock infrastructure. UT ROD at 70-76.</li> <li>• <b>ID, UT, WY:</b> Weaken certain habitat objectives (e.g., 7” grass height). ID FEIS at App-2-11; UT ROD at 25-27; WY FEIS at 2-25.</li> </ul> <p><b>OR:</b> Removes prohibitions on livestock grazing within 13 Research Natural Areas. OR ROD at 1-6.</p>	<ul style="list-style-type: none"> <li>• “The Proposed RMP Amendment would not have an explicit requirement for analysis of thresholds and responses during permit renewal or modification; however, it would require analysis of one alternative that would allow for adaptive management to meet or make progress toward meeting the wildlife/Special Status Species standard. . . . The impacts . . . would be similar to those for the No-Action Alternative. Localized, adverse impacts on Greater Sage-Grouse in GHMA may occur, but conservation of Greater Sage-Grouse in Wyoming would not be affected.” WY FEIS at 4-11 to 4-12; <i>see also</i> UT FEIS at 4-13; ID FEIS at 4-14 to 4-15.</li> <li>• Removal of infrastructure evaluation “would be unlikely to affect Greater Sage-Grouse conservation.” WY FEIS at 4-10 to 4-13. No analysis in UT FEIS.</li> <li>• <b>WY:</b> “Allotments in PHMA would not be prioritized for field checks under the Proposed RMP Amendment; however, there would be more discretion to identify the allotments with the highest needs at the local level for monitoring actual use, utilization, use supervision, etc., which may already be those allotments in PHMA.” WY FEIS at 4-11; ID FEIS at 4-15.</li> <li>• <b>UT:</b> “Changes in the habitat objectives table . . . will have beneficial impacts on management and Greater Sage-Grouse habitat because the indicators and values more accurately reflect vegetation characteristics in Utah . . . .” UT FEIS at 4-19. No environmental analysis of remaining changes in UT.</li> <li>• “Seven inches is not a threshold where Greater Sage-Grouse nesting success suddenly disappears. Multiple studies have found successful Greater Sage-Grouse nests in areas that averaged less than 7 inches of herbaceous cover (Connelly et al. 2000).” ID FEIS App. 1 at 4-14; <i>see also</i> WY FEIS at 4-10.</li> <li>• <b>UT:</b> analysis at OR FEIS 4-3.</li> </ul>

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Habitat boundary adjustments	<ul style="list-style-type: none"> <li>Habitat boundary changes require Plan Amendment (public comment)</li> </ul>	<ul style="list-style-type: none"> <li><u>ID</u>: boundary adjustments allowed through Plan Maintenance (no public involvement). ID FEIS at App-2-3.</li> <li><u>UT</u>: boundary adjustments allowed at the project level by BLM staff, based on site surveys. UT ROD at 31-34.</li> <li><u>UT, ID</u>: eliminates requirement that BLM evaluate project area before authorization to determine if it contains sage-grouse habitat not already designated as PHMA. UT ROD at 52; ID FEIS at App-2-3.</li> <li></li> </ul>	<ul style="list-style-type: none"> <li><u>ID</u>: “If HMA habitat boundary changes were more than minor mapping error fixes, then determining the environmental consequences would not be determined at this time. . . . The BLM anticipates that any impact resulting from a change in map boundaries would be consistent with those described in 2015.” ID FEIS Appx. 1 at 4-8.</li> <li><u>UT</u>: No environmental analysis of change.</li> </ul>
Exceptions to plan requirements	<ul style="list-style-type: none"> <li>Exception process tailored to the specific resource; exceptions not allowed for many provisions; consent of USFWS often required.</li> </ul>	<ul style="list-style-type: none"> <li><u>NV</u>: Under new “allocation exception,” BLM state director can grant an exception to any stipulation, buffer, timing restriction, etc. if <u>any</u> of the following applies: (1) location is not and lacks potential to be habitat; (2) adverse impacts will be offset; (3) public health, safety concerns; (4) reauthorization of existing infrastructure in previously disturbed sites <u>or</u> expansion that won’t result in new impacts; (5) routine administrative function, prior existing use, authorized use, valid existing right, or existing infrastructure (i.e., roads) that serve a public purpose and adverse impacts will be mitigated; (6) non-disposal or exchange of certain lands. This broadens circumstances in which an exception can be granted and eliminates requirement of USFWS consent. NV ROD at 2-12 to 2-13.</li> </ul>	<ul style="list-style-type: none"> <li><u>NV</u>: “Because these criteria ensure that projects are either in unsuitable Greater Sage-Grouse habitat; do not result in direct, indirect, or cumulative impacts on Greater Sage-Grouse; or can be offset, with the exception of those needed for public health and safety, no new impacts on Greater Sage-Grouse and its habitat are anticipated above those analyzed in the 2015 Final EIS.” NV FEIS at 4-11.</li> </ul>

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Noise restrictions	<ul style="list-style-type: none"> <li>• <u>WY</u>: Noise thresholds and monitoring protect leks in all habitat designations.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>WY</u>: Eliminated noise restrictions in GHMA (now applied in PHMA only). WY FEIS at A-11.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>WY</u>: “The impacts associated with clarifying that the noise measurement and monitoring condition of approval (COA) would apply only to leks within Greater Sage-Grouse PHMA would have similar impacts as those described under the No-Action Alternative for the RMPAs and for the RMP revisions. . . . The removal of noise restrictions in GHMA would likely result in localized, adverse impacts on Greater Sage-Grouse but would not affect Greater Sage-Grouse conservation in Wyoming.” WY FEIS at 4-13 to 4-14.</li> </ul>
Coal leasing	<ul style="list-style-type: none"> <li>• <u>UT</u>: PHMA is “essential habitat” for purposes of the suitability criteria set forth at 43 CFR § 3461.5(o)(1).</li> </ul>	<ul style="list-style-type: none"> <li>• <u>UT</u>: PHMA no longer deemed “essential habitat” and therefore “unsuitable” for coal leasing. UT ROD at 87-88.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>UT</u>: No environmental analysis provided. Change deemed a “clarification.” UT FEIS at 2-8, Table 2-1.</li> </ul>
Travel Management	<ul style="list-style-type: none"> <li>• <u>UT</u>: plan imposed specific requirements for travel management plans impacting greater sage-grouse.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>UT</u>: eliminates detailed requirements for considering greater sage-grouse in travel management plans. UT ROD at 101-103.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>UT</u>: No environmental analysis provided.</li> </ul>
Non-energy leasable materials	<ul style="list-style-type: none"> <li>• <u>NV</u>: PHMA closed to new non-energy mineral leasing.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>NV</u>: restriction now subject to “allocation exception” criteria. NV ROD at 2-35.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>NV</u>: “Because these criteria ensure that projects are either in unsuitable Greater Sage-Grouse habitat; do not result in direct, indirect, or cumulative impacts on Greater Sage-Grouse; or can be offset, with the exception of those needed for public health and safety, no new impacts on Greater Sage-Grouse and its habitat are anticipated.” NV FEIS at 4-11.</li> </ul>