

Sagebrush Ecosystem Program

201 Roop Street, Suite 101
Carson City, Nevada 89701
Telephone (775) 687-2000

www.sagebrusheco.nv.gov

STEVE SISOLAK
Governor



Kelly McGowan, Program Manager
Daniel Huser, Forestry/Wildland Fire
Kathleen Petter, State Lands

STATE OF NEVADA
Sagebrush Ecosystem Program

February 07, 2022

Bureau of Land Management – Utah State Office
Attn: Patricia Deibert, National Sage-Grouse Coordinator
440 W 220 S, Ste. 500
Salt Lake City, UT 84101

RE: Bureau of Land Management’s (BLM) Notice of Intent to Amend Land Use Plans Regarding Greater Sage-grouse Conservation and Prepare Associated Environmental Impact Statements

Dear Ms. Deibert:

The Sagebrush Ecosystem Program, through the Nevada Department of Conservation and Natural Resources, appreciates the opportunity to provide comments in the scoping process relevant to the Greater Sage-Grouse Land Use Plan Amendments and EISs. The State of Nevada has developed a Greater Sage-Grouse Conservation Plan, Strategic Action Plan, and has participated as a cooperating agency during the development of the BLM 2015 and revised 2019 Plans. Our agency has a significant understanding and appreciation of the purpose and need for the development, maintenance, and the collaboration necessary to implement meaningful plans to conserve and protect the sagebrush ecosystem habitats in Nevada that Greater Sage-Grouse are dependent on.

We have requested Cooperating Agency status for the upcoming review of the Greater Sage-Grouse Land Use Plans and EISs and look forward to providing our knowledge and expertise into the planning effort. We encourage Nevada BLM to conduct close coordination with our agency during this planning process to maintain and achieve consistency with the State’s Greater Sage-Grouse Conservation Plan and Strategic Action Plan. Successful protection and enhancement of the sagebrush ecosystem is dependent on close coordination and alignment of both state and federal land use plans.

As part of Nevada’s Greater Sage-Grouse Conservation Plan, Nevada developed and adopted a robust compensatory mitigation tool referred to as the Conservation Credit System (CCS). The CCS incorporates the best available science, and was developed in collaboration with multiple state, local, and federal agencies, as well as non-profit organizations, landowners, and industry. The Conservation Plan and CCS were unanimously approved by the governor appointed Sagebrush Ecosystem Council. In addition, Nevada’s Legislation Commission adopted regulations requiring mitigation for certain anthropogenic disturbances on public land that impact Greater Sage-grouse and their habitats.

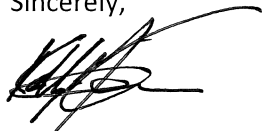
Compensatory mitigation for Greater Sage-Grouse and their habitats have been a regulatory requirement since October 2019. To date, twenty-two (22) mitigation transactions have occurred using the CCS with the potential for over forty (40) in the next two years. We strongly encourage NV BLM to continue coordinating with the State to ensure quantifiable and relevant mitigation continues to occur using the standardized methodologies developed within the CCS.

Mutual points of interest to the State of Nevada identified during the public scoping meeting include:

- Fire and Invasives - strategically plan and fund efforts to address the threat and/or recovery from loss
- Identification of high priority habitats/areas for protection and enhancement
- Habitat Management Areas - designation and procedures for updating
- Habitat Objectives – review and revisions
- Mitigation Hierarchy - adherence and objectives
- Wild Horse and Burro - funding and plan to achieve and maintain Appropriate Management Levels
- Adaptive Management - review of process, involvement, and implementation
- Exception Processes - review of existing guidelines
- Pinyon and Juniper tree expansion - strategically applying removals specific to habitat recovery/resilience
- Common Ravens -implementation of policies and procedures that reduce subsidies and other opportunities that perpetuate their expansion and population increase

While many of these points of interest may not be within the State's jurisdiction, our intent is to continue to support strategic implementation of conservation efforts that will have meaningful and quantifiable results. Of particular concern is the continued loss of habitats due to wildfire and invasive annual grasses which are identified as the most significant threats to sagebrush habitats in Nevada. We look forward to providing significant contributions to the planning and implementation efforts to conserve, protect, and rehabilitate Nevada's sagebrush ecosystems.

Sincerely,



Kelly McGowan,
Manager, Sagebrush Ecosystem Program
Nevada Department of Conservation and Natural Resources

Cc:

Jon Raby, State Director, Bureau of Land Management Nevada
Bradley Crowell, Director, Nevada Department of Conservation and Natural Resources
J.J. Goicoechea, Chairman, Sagebrush Ecosystem Council