

## V. CAUSAL FACTOR ANALYSIS AND MANAGEMENT RECOMMENDATIONS

The Local AMRTs are tasked with completing a causal factor analysis and provide management recommendations associated with each population or habitat trigger. The results from this process are provided below in a *Causal Factor* table for each Conservation Planning Area.

### 5.3 NORTH CENTRAL CONSERVATION PLANNING AREA (POINT OF CONTACT - MELANY ATEN)

	<b>AMRT Management Recommendations</b>	<b>Agency Response</b>
	<i>Please list appropriate, realistic, and targeted responses for each causal factor. Please limit/prioritize to a maximum of 5 actions per/PMU. Actions need not be restricted to federal agencies (i.e., BLM/Forest Service), they may involve other governmental organizations (e.g., NDOW, County, State, etc.). Please identify which agencies the recommendations are meant for.</i>	<i>Please provide a brief, detailed explanation that responds to the request. If the request cannot be addressed, please detail the reason and how future requests may be more meaningful.</i>
<b>Category</b>	<p><u><i>Santa Rosa Habitat Trigger:</i></u></p> <p>Multiple wildfires have contributed to habitat declines. Primarily Martin Fire.</p> <p>Medusahead/cheatgrass.</p> <p>Legacy management on stringer meadows</p> <p>Feral (stray) horses at north end.</p>	
<b>Invasive Weeds</b>	Implementation and coordination of medusahead treatments. Coordinate with LAWG identified areas. <b>(BLM)</b>	<b>USFS Response:</b> Within available funds and staffing, the Humboldt-Toiyabe National Forest Invasive Plants program prioritizes Medusahead under its Early Detection Rapid Response (EDRR) program.

		<p>The Forest Service also coordinates with Cooperative Weed Management Areas, conservation districts, counties, tribal governments, the Nevada Department of Agriculture, the Nevada Department of Wildlife, BLM and the University of Nevada, Reno to team up to fight invasive winter annual grasses. Agencies plan treatments jointly to increase efficiency and avoid overlap. Working with other agencies, the Forest Service are able to access funding to increase the number of acres treated.</p> <p><b><u>BLM-NV Response:</u></b></p> <p>BLM has been treating 2,500 acres/year as a part of fuels management and post fire rehabilitation activities.</p> <p>Need assistance from private landowners, USFS, and county with regards to implementation and coordination of treatments.</p> <p>Consider submitting a project proposal through next year’s AMRT to address this. Identify location, acreage, treatment options, possible partners, etc.</p>
Fuels Management	<p>Proactive approach to fuels reduction in strategic locations. <b>(BLM, USFS)</b></p> <p>Use of programmatic EISs and EAs for fuels reduction and targeted grazing <b>(BLM)</b>.</p>	<p><b>USFS Response:</b> The Forest Service has existing plan direction related to proactive fuels reduction:</p>

	<p>Maintain Fuel Breaks (<b>BLM</b>).</p> <p>Provide a list of fire rehabilitation efforts (<b>BLM</b>).</p> <p>Bullhead fuel break on private land needs assistance with funding for seed (NDOW may be able to assist). Request BLM use Programmatic Fuel Breaks EIS to continue this fuel break on public land in coordination with landowner and agencies. (<b>BLM, NDOW</b>)</p>	<p><b>GRSG-GRSGH-GL-033-Guideline</b> – To facilitate safe and effective fire management actions, in priority and general habitat management areas and sagebrush focal areas, fuel treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the greater sage-grouse desired conditions in table 1) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of greater sage-grouse attributes to move away from desired conditions (table 1a and table 1b).</p> <p><b>GRSG-FM-GL-053-Guideline</b> – In priority and general habitat management areas and sagebrush focal areas, fuel treatments should be designed to maintain, restore, or enhance greater sage-grouse habitat.</p> <p>In 2019, the Humboldt-Toiyabe National Forest (HTNF) completed 24,069 acres of fuels reduction treatments, treated 4,205 acres of invasive weeds and completed 382 acres of prescribed fire. Project planning and implementation occurs at multiple scales. Treatments of vegetation and fuels to enhance sage grouse and other wildlife habitat has contributed towards the fuels treatment target.</p> <p>The Forest Service emphasizes fuels and vegetation treatments to include strategic placement of landscape level treatments for communities, multiple habitats, and other restoration activities under a single project with multiple objects. Smaller scale fuel breaks such as roadside treatments included in landscape level treatments are also used to provide for safe and effective fire suppression strategies.</p>
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To plan projects, the Forest Service uses existing policy such as forest plan direction, Fire and Invasive Threats analysis/recommendations, and Multi-Jurisdictional Landscape Risk Assessment and Treatment Prioritization Analyses. Broad scale planning includes out-year project planning and funding allocation for treatments using a 5-year planning horizon. Existing NEPA decisions and interagency planning efforts are also included in planning the location and timing of treatments. The Forest Service is working on additional efforts to analyze for prioritized landscape level treatments across multiple jurisdictions in order to be more efficient in addressing priority treatment areas with limited funds. These efforts also support the Chief's Shared Stewardship Strategy.

Project-level NEPA involves local coordination with partners/stakeholders, public scoping, consultation with tribal nations, and consultation with State and other Federal agencies. Best available science is used to identify site specific treatment areas and types (general technical reports, resistance and resilience matrix, ecological site descriptions, state and transition models) in order to ensure success of treatment.

Treatment methods considered during planning include thinning, mastication, Phase 1 and 2 pinyon/juniper thinning/removal, prescribed burning in a variety of vegetation types, herbicide treatments, and targeted grazing. Current larger scale efforts for planning these treatments include forest-wide conditional NEPA analyses for prescribed fire and

herbicide treatments, targeted grazing for fine fuels reduction, and implementing the NV native seed strategy.

**USFS Response:** The HTNF is currently preparing an Environmental Assessment for invasive plant treatments on all HTNF lands in Nevada. This EA includes the use of targeted grazing treatments on invasive plant species. This EA and existing categorical exclusions should be sufficient for the Forest Service to implement targeted grazing treatments. Once the EA is completed, any targeted grazing treatment area that requires construction of new fences, water developments or other infrastructure will likely require additional site specific analysis under NEPA.

**BLM-NV Response:**

The Winnemucca BLM currently has 3,500 acres of fuelbreaks in place within the Owyhee Desert area north of the Martin Fire. These fuelbreaks are 300 feet wide and follow existing roads (150 ft per side of roadway). All fuelbreaks have been maintained within the last two years to include mowing and herbicide treatments. This is in addition to fuelbreaks adjacent to highways and around the community of Paradise Valley. Over two thousand acres of greenstrips trips have been planted within the Martin Fire perimeter along roads. Collectively, the BLM has installed and regularly maintains approximately 15,000 acres of fuelbreaks within the Santa Rosa PMU

Martin Fire Fall 2018-Spring 2020

		<p>20,000 acres drill seeded</p> <p>172,000 acres perennial grass seeding</p> <p>121,000 acres of sagebrush seeding (includes some seeding on 2011 Hot Springs Fire)</p> <p>2,500 acres greenstrip seeding (roadways)</p> <p>The Winnemucca District already has a district wide fuels reduction EA (<a href="#">DOI-BLM-NV-W000-2014-0004-EA</a>) in place, and treats greater than 20,000 acres annually for fuels and vegetation management. The <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (<a href="#">DOI-BLM-ID-0000-2017-0003-EIS</a>) will be available for use before September 2020 and , the <i>Programmatic EIS for Fuel Breaks in the Great Basin</i> (<a href="#">DOI-BLM-ID-0000-2017-0001-EIS</a>) is already available for use.</p> <p>The Winnemucca District will use the Targeted Grazing EA (<a href="#">DOI-BLM-NV-0000-2019-0003-EA</a>), which will be completed before the end of FY2020, in applicable situations. There has been limited fuels reduction using livestock and prescriptive grazing in conjunction with Emergency stabilization and rehabilitation activities from the districtwide EA.</p> <p>The Winnemucca BLM has never been made aware of the Bullhead fuelbreak, and is not aware of it's location, but would be willing to look at</p>
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		options for extending onto BLM land if feasible, but the proposal needs to be brought forward to the BLM.
Vegetation Management	<p>Tom Basin fire footprint needs to be revisited and follow-up management where necessary <b>(BLM)</b></p> <p>Develop sagebrush islands in burned area. Monitor plantings already done and respond if needed follow up seeding etc. needs completed. Priority on nesting areas. Put emphasis on protecting sagebrush islands already in the area. Ensure policy is enforced of not doing back burns on these areas. <b>(BLM)</b></p> <p>Degraded meadows, mostly due to legacy management, need focus on restoring. Mostly on northwest quarter of Martin Fire</p> <p>Support LAWG identified projects (Rock Creek and Mud Springs) <b>(BLM)</b></p> <p>Fund and complete a coordinated assessment of these meadow resources to see what's there and what should be prioritized. <b>(BLM)</b></p>	<p><b>USFS Response:</b> The Santa Rosa Ranger District has been focusing on watershed improvement projects in this PMU. A priority watershed assessment has been completed and meadow, stream, and riparian improvement projects are ongoing.</p> <p><b><u>BLM-NV Responses:</u></b></p> <p>This Tom Basin fire footprint falls under United States Forest Service jurisdiction.</p> <p>The BLM has been planting approximately 300,000 seedlings annually within the Winnemucca District. In addition, the BLM regularly completes follow-up sagebrush seeding in past fire areas to improve revegetation efforts, most recently on over 10,000 acres for the 2011 Hot Springs Fire east of Paradise Valley.</p> <p>There is already a standing best management practice and policy to retain or save sagebrush islands to the extent practicable and it is our practice to conserve sage brush islands after perimeter control is obtained. It is not prudent, however, to dictate areas where a backfire or burn out operation may or may not occur. These are tactical decisions made on the ground and in consult with agency administrators depending on the size and scope of the operation and risk analysis. Putting arbitrary constraints on tactics may have the unintended consequence of fires becoming larger when proper tactics cannot be used.</p>

There is no policy to enforce that states backfires may not be used. Backfires (common terminology) are a tactic, often employed in conjunction with existing strategic fuelbreaks. Once the fire or a portion of the fire has been contained, then the policy or direction dictates that any existing stands of native vegetation or sagebrush will be fully suppressed if it can safely be done to retain the existing seed source.

Please define policy mentioned or clarify meaning

Please provide specific locations and acreage (maps would be useful) for locations of proposed degraded meadow restoration projects.

Please provide information about LAWG identified projects (Who will implement the project (are there any partners?))? What type of project is it? Where is the project located (maps would be needed)? When would the project be implemented? Why is the project needed?)

Please provide a project proposal for the coordinated assessment of meadow resources (location/acreages of meadows (approximate)) and include in proposal why a coordinated assessment would be useful.

<p>Wildfire Response</p>	<p>Pre-position of fire fighting resources through fed, state, and county coordination.</p> <p>Ensure REAF (resource advisors) capacity and participation on all fires.</p>	<p><b>USFS Response (1):</b> The Humboldt-Toiyabe National Forest has forest plan direction regarding repositioning suppression resources in the 2015 Greater Sage Grouse Plan Amendment:</p> <p><b>GRSG-FM-GL-063-Guideline</b> On critical fire weather days, protection of greater sage-grouse habitat should receive high consideration, along with other high values, for positioning of resources.</p> <p><b>GRSG-FM-GL-064-Guideline</b> – Line officers should be involved in setting pre-season wildfire response priorities and, prioritizing protection of priority and general habitat management areas and sagebrush focal areas, along with other high values. During periods of multiple fires or limited resource availability fire management organizational structure (local, regional, national) will prioritize fires and allocation of resources in which sage grouse habitat is a consideration along with other high values.</p> <p>During wildfire season, the Forest Service coordinates regularly with the other fire agencies to monitor conditions and preposition resources to protect sage grouse habitat and other high resource values. Local cooperators talk on a weekly or daily basis when conditions warrant and share information with fire management staff at the state and local level to assist in identifying where additional initial attack resources may be needed.</p>
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Data used in determining whether conditions warrant prepositioning resources include the fuel moisture database, energy release components obtained from local Remote Area Weather Stations, the National Interagency Fire Center's predictive services outlook for the Great Basin (7-day and monthly), the U.S. Drought Monitor for Nevada, and information about events that could result in wildfire starts, such as Fourth of July celebrations, large public gatherings or a critical fire weather event (lightning, wind event, high Haines index). Regional and national preparedness levels affect the availability of resources for prepositioning.

Sage grouse habitat maps are loaded into the Computer Automated Dispatch system, allowing interagency dispatch to determine when a fire start may potentially threaten sage grouse habitat. Initial attack crews verify this information when they arrive on site, and employ appropriate suppression tactics.

**USFS Response (2):** The Humboldt-Toiyabe National Forest has forest plan direction pertaining to the assignment of resource advisors to fires in the 2015 Greater Sage Grouse Plan Amendment:

**GRSG-FM-GL-062-Guideline** – In or near priority and general habitat management areas and sagebrush focal areas, a greater sage-grouse resource advisor should be assigned to all extended attack fires.

Additional relevant plan direction includes:

**GRSG-FM-GL-060-Guideline** – Unit-specific greater sage-grouse fire management related information should be added to wildland fire decision support systems (currently, the Wildland Fire Decision Support System), local operating plans and resources advisor plans to be used during fire situation to inform management decision, aid in development of strategies and tactics and for the prioritization of resources.

**GRSG-FM-GL-061-Guideline** – Localized maps of priority and general habitat management areas and sagebrush focal areas should be made available to fireline, dispatch and fire support personnel.

The Humboldt-Toiyabe National Forest attempts to assign resource advisors to wildland fires in sage grouse habitat that extend beyond initial attack. Lack of qualified resource advisors is a concern. The Forest Service encourages qualified staff in partner agencies to pursue resource advisor training and make themselves available for assignment. Sage grouse habitat layers are preloaded into the Forest Service Wildland Fire Decision Support System, and line officers and duty officers have access to this data to make informed decisions on the assignment of resources and selection of strategies and tactics.

**BLM-NV Response:**

Already occurring.

		Already occurring
Range Management	Wildlife friendly fencing Needs to be installed or replaced replaced ( <b>BLM</b> ) Stockmanship should be supported through funding	<p><b>USFS Response:</b> The Forest Service has had an agreement with Great Basin Institute and Nevada Conservation Corps since 2016 to install flight diverters, remove fences, and to build wildlife-friendly fences. We hope to continue to support the agreement into the future.</p> <p><b>USFS Response:</b> Livestock management practices needed to meet the terms and conditions of grazing permits, such as hiring riders, purchasing and placing salt/supplements and maintaining range improvements, are the responsibility of the permittee and they are expected to bear the costs associated with management of livestock on their permitted allotments. There is a possibility that the Forest Service may be able to provide funding toward a stockmanship training course for permittees.</p> <p><b><u>BLM-NV Response:</u></b></p> <p>Please provide specific locations and how many miles of wildlife friendly fencing in the specific location needs to be replaced or installed. Specify whether it is new fence installation or replacement (modification) of an existing fence.</p> <p>Funding or supporting Stockmanship (i.e. knowledgeable and skillful handling of <a href="#">livestock</a> in a safe, efficient, effective, and low-stress manner. Primary aspects of stockmanship include: <a href="#">low-stress livestock handling</a> (LSLH), <a href="#">natural horsemanship</a>, <a href="#">ranch roping</a>, <a href="#">dog handling</a>, and <a href="#">facilities design</a>) is outside the scope of BLM’s mission.</p>

		Funding or support could be pursued by grants or possibly through a county or state agency.
Misc.	Completely remove stray horses (USFS)	<b>USFS Response:</b> The Forest Service, in cooperation with the Fort McDermitt Paiute and Shoshone Tribe, have recently conducted operations to remove tribal members' privately owned horses that are grazing without authorization on the Santa Rosa Ranger District. Due to the number of horses to be removed and the limited capacity of the tribal holding facility, multiple gathers are necessary. In December 2018, 532 horses were removed in 4 days before weather shut down the operation. In August 2019, 640 horses were removed in 8 days of operations. An estimated 150 to 300 head remain on or near the Forest. The Forest Service plans to conduct a survey flight to confirm remaining numbers of horses and issue a contract for a final joint removal effort.
<p><u>Lone Willow Habitat Trigger:</u></p> <p>1 Soft Lek Trigger</p> <p>Multiple wildfires have contributed to habitat declines. Holloway Fire primarily. Multiple past fires in this area (whole Double H Range)</p> <p>Meadow degradation including extensive hoary cress, thistles, etc.</p> <p>Recognize Lithium Nevada/Western Lithium Exploration Activities as a Habitat Warning.</p> <p>So far, any impacts are from exploration. Increased travel, noise, etc. They will use the CCS for mitigation under their POO permit.</p>		
Invasive Weeds		
Fuels Management	Proactive approach to fuels reduction in strategic locations. (BLM, USFS)  Use of programmatic EISs and EAs for fuels reduction and targeted grazing (BLM).	<b>USFS Response:</b>  No USFS Response Needed: No NFS lands in PMU

	<p>Montana Mountains Fuels Management Plan (included riparian restoration) completed (2009?) that got some projects done. Look at this for other projects that can be done.</p>	<p><b><u>BLM-NV Responses:</u></b></p> <p>There is no USFS managed land in this area. The BLM has a network of strategic fuelbreaks in place within the Montana Mountains, with over 50 miles of fuelbreaks in place which are maintained periodically, most recently in 2019. There is also an additional 10,000+ acres of other treatments to reduce fine fuels with the Lone Willow area.</p> <p>Plan completed in 2012.</p> <p>The Winnemucca District already has a district wide fuels reduction EA (<a href="#">DOI-BLM-NV-W000-2014-0004-EA</a>) in place, and treats greater than 20,000 acres annually for fuels and vegetation management. The <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (<a href="#">DOI-BLM-ID-0000-2017-0003-EIS</a>) will be available for use before September 2020 and , the <i>Programmatic EIS for Fuel Breaks in the Great Basin</i> (<a href="#">DOI-BLM-ID-0000-2017-0001-EIS</a>) is already available for use.</p> <p>The Winnemucca District will use the Targeted Grazing EA (<a href="#">DOI-BLM-NV-0000-2019-0003-EA</a>), which will be completed before the end of FY2020, in applicable situations.</p>
<p>Vegetation Management</p>	<p>Develop sagebrush islands in burned area. Monitor plantings already done and respond if needed follow up seeding etc. needs completed. Priority on nesting areas. Put emphasis on protecting sagebrush islands already in the area. Ensure policy is enforced of not doing back burns on these areas. <b>(BLM)</b></p>	<p><b><u>USFS Response:</u></b></p> <p>No USFS Response Needed: No NFS lands in PMU</p> <p><b><u>BLM-NV Response:</u></b></p>

	<p>Collaboratives and specific projects in mind and in play (upper end of Jordan Meadows allotment, Kings River corridor. Help in needed to push this forward. Related to contracting, complicated land ownership, final agreements between BLM and NDF. These are projects that can be completed now if this process can be streamlined. <b>(BLM, NDF)</b></p> <p>Some meadow work identified. Approvals for work exist on 4<sup>th</sup> of July (exclosure and road work). Look at this and see if other work can be done tiering or using this approval.</p>	<p>The BLM has been planting approximately 300,000 seedlings annually within the Winnemucca District, in addition to continued follow-up rehabilitation of burned areas, most recently 6,000 acres burned in the Holloway Fire that was sprayed, drill seeded, and then broadcast with strips of sagebrush over a three year period.</p> <p>There is already a standing best management practice and policy to retain or save sagebrush islands to the extent practicable and it is our practice to conserve sage brush islands after perimeter control is obtained. It is not prudent, however, to dictate areas where a backfire or burn out operation may or may not occur. These are tactical decisions made on the ground and in consult with agency administrators depending on the size and scope of the operation and risk analysis. Putting arbitrary constraints on tactics may have the unintended consequence of fires becoming larger when proper tactics cannot be used.</p> <p>There is no policy to enforce that states backfires may not be used. Backfires (common terminology) are a tactic, often employed in conjunction with existing strategic fuelbreaks. Once the fire or a portion of the fire has been contained, then the policy or direction dictates that any existing stands of native vegetation or sagebrush will be fully suppressed if it can safely be done to retain the existing seed source. Please define policy mentioned or clarify meaning.</p>
Range Management	Stockmanship should be supported through funding	<p><b>USFS Response:</b></p> <p>No USFS Response Needed: No NFS lands in PMU</p>

		<p><b>BLM-NV Response:</b></p> <p>Funding or supporting Stockmanship (i.e. knowledgeable and skillful handling of <a href="#">livestock</a> in a safe, efficient, effective, and low-stress manner. Primary aspects of stockmanship include: <a href="#">low-stress livestock handling</a> (LSLH), <a href="#">natural horsemanship</a>, <a href="#">ranch roping</a>, <a href="#">dog handling</a>, and <a href="#">facilities design</a>) is outside the scope of BLM’s mission. Funding or support could be pursued by grants or through a county or state agency.</p>
Misc.	Education component to Lithium NV employees and managers on why sage grouse conservation measures and BMPs are important and should be implemented.	<p><b>USFS Response:</b></p> <p>No USFS Response Needed: No NFS lands in PMU</p> <p><b>BLM-NV Response:</b></p> <p>This is a great idea! Consider submitting a proposal for creating an educational brochure (or other materials) to be distributed.</p>
<p><i>Sheldon Population Trigger:</i></p> <p>1 Soft Lek Trigger + Soft Cluster Trigger</p> <p>Drought conditions have contributed to population-level stress. Sagebrush die off and decline due to drought and Aroga moth.</p> <p>Horse issues on basically any open and accessible water sources degrading these sources important to sage grouse. Oregon issue.</p>		
Range Management	Concern expressed by some about removal of man-made water structures on Refuge. Concern expressed by some about Refuge management focused on pronghorn antelope may not be conducive to sage grouse management. Need more holistic approach. (USFWS)	<p><b>USFS Response:</b></p> <p>No USFS Response Needed: No NFS lands in PMU</p> <p><b>USFWS Response:</b></p> <p>The Refuge requests clarification and examples of the statement Concern expressed by some about removal of man-made water structures on</p>

		<p>Refuge. The Refuge has only removed non-functioning water structures; however, there is an active effort to initiate a project to restore and rehabilitate natural hydrologic function to developed springs. This effort started with a research project in 2017 and resulted in a Master’s Thesis that included management recommendations. None of the prescriptive recommendations have been implemented post research project. The research project demonstrated that returning a more natural hydrology to springs has resulted in an increase in soil moisture and biomass productivity, which should provide additional late summer brood rearing habitat for GRSG.</p> <p>The Refuge focuses on habitat management to support all wildlife species, and not single species management. However, using pronghorn and sage grouse as surrogates helps support an adaptive management approach across the refuge. Monitoring for sage grouse, pronghorn, and bighorn sheep provide a measure of feedback while evaluating the effects of active land management actions. The most significant active land management efforts include feral horse removal, juniper management, and weed management. All management actions are directed at restoring and managing wildlife habitat for all species, including sage grouse.</p> <p>Please clarify, with examples, Need more holistic approach.</p>
Wildlife Management	Predator (raven) control	<p><b>USFS Response:</b></p> <p>No USFS Response Needed: No NFS lands in PMU</p>

		<p><b><u>USFWS Response:</u></b></p> <p>Please document/demonstrate where on the refuge ravens are causing significant predation on sage grouse. The Refuge will require data that demonstrate significant effects on sage grouse in order to evaluate action.</p>
Misc	<p>Request participation from Refuge management at these adaptive management meetings. <b>(SETT)</b></p> <p>Support management and removal of horses. While horses are primarily in OR and CA, the sage grouse move across state lines. <b>(BLM)</b></p>	<p><b><u>USFS Response:</u></b></p> <p>No USFS Response Needed: No NFS lands in PMU</p> <p><b><u>USFWS Response:</u></b></p> <p>The Refuge has not been invited to participate in the Sagebrush Ecosystem Technical Team and questions how management recommendations are prescribed without input from Refuge Staff until this point. Refuge staff would be very supportive of being actively engaged on the Technical Team to discuss ongoing and future management and identify additional management actions to support all sagebrush dependent wildlife.</p> <p>The Refuge requests clarification of statement While horses are primarily in OR and CA, the sage grouse move across state lines. Sheldon NWR removed most feral horses by 2014. Only 24 remain on the Refuge as of the 2019 Tri State Survey. The Refuge invests significant resources to maintain boundary fence to prevent wild horses entering from adjacent HMAs in both Oregon and Nevada.</p> <p><b><u>USFWS Responses specifically to the causal factors listed by AMRT:</u></b></p>

		<p>Sheldon-Hart Mountain NWR Complex (Refuge) understands fluctuating environmental conditions occur. The Refuge requests documentation that details the extent of sagebrush mortality from drought and the Aroga moth.</p> <p>The Refuge effectively removed all feral horses in 2013-2014. The most recent Tri-State Survey recorded approximately 24 feral horses on Sheldon NWR. In addition, the Refuge aggressively maintains the entire refuge boundary to exclude horses from entering the refuge from adjacent HMAs. With that said, the Refuge requests clarification of statement since water source degradation has not occurred since 2014. In addition, the Refuge requests clarification of Oregon issue.</p> <p><b><u>BLM-NV Response:</u></b></p> <p>The BLM is committed to working with Congress, state and local governments, partner organizations, and the public to find commonsense solutions for putting the wild horse and burro program back on a sustainable and fiscally responsible track.</p> <p>The BLM could prioritize HAF assessments and sage-grouse habitat inventory in HMAs that are within triggered areas to help support gather priorities. However, gathers are scheduled at a national level, not at a State Office or District Office level.</p>
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## 5.8 COMMENTS NOT SPECIFIC TO ANY AREA

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NDOT Comments:

- **Noxious and invasive weed management:** NDOT recognized the importance of this issue last year and NDOT through the ENV Division now provides funding to the Nevada Department of Agriculture for a NDOT dedicated full-time position to serve as point for NDOT's weed management efforts. This position will provide review of noxious weed management plans submitted by contractors and permittees as well as provide training and specialist assistance to NDOT staff.
- **Fuel Breaks:** generally, highways serve as effective fuel breaks, however any focus to increase the effectiveness of NDOT ROW as fuels breaks must consider Department air quality and stormwater requirements if reducing vegetation is the goal.
- **Wildfire:** NDOT through its District personnel will continue to work closely with wildfire incident teams.
- **Health of grass scrub communities:** NDOT will continue to use native seed mixes as part of its revegetation efforts within NDOT ROW.
- **Wild and estray horse population management:** NDOT supports efforts to manage the populations of wild and estray horses as growing populations have become a safety issue on NDOT roadways.

USFWS Comments:

- The U.S. Fish and Wildlife Service (Service) recommends the Ruby Lakes National Wildlife Refuge be included in the list of interested stakeholders. They have been contacted for a review of this report and their comments are included herein.