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**STATE OF NEVADA**  
**Sagebrush Ecosystem Program**

January 24, 2014

Amy Lueders, Nevada State Director  
BLM Nevada State Office  
1340 Financial Boulevard  
Reno, NV 89502

William Dunkelberger, Forest Supervisor  
Humboldt-Toiyabe National Forest  
1200 Franklin Way  
Sparks, NV 89431

RE: Nevada and Northeast California Sub-regional Greater Sage-Grouse Draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (EIS)

Dear Ms. Lueders and Mr. Dunkelberger,

The Sagebrush Ecosystem Council (SEC) appreciates the opportunity to participate in the review of the above mentioned document. This effort by the Bureau of Land Management (BLM) and United States Forest Service (USFS) represents an unparalleled planning effort to achieve sage-grouse conservation in our state, which complements the efforts of Nevada. The SEC also appreciates the continued close coordination between your staff and the Sagebrush Ecosystem Technical Team (SETT).

The SEC would like to reiterate, through the authority granted us in AB461 (2013 Legislative Session), it is our desire for the State's Alternative (Alternative E) to be selected as the BLM's preferred alternative. Any management alternative as a whole, or components of such, that are inconsistent with the state plan or other plans, policies, controls, or laws of the state of Nevada and local government jurisdictions, must be reconciled as required by National Environmental Policy Act (NEPA), Federal Land Policy Management Act (FLPMA), and respective regulations. The SEC represents a unified, broad, stakeholder effort to produce a plan to protect sage-grouse through a public and transparent process.

The SEC is encouraged that the BLM/USFS has incorporated key elements of Alternative E, such as the Conservation Credit System and coordination with the SETT into the BLM/USFS Alternative (Alternative D). However, the SEC is concerned that the BLM/USFS have currently selected Alternative D as the preferred alternative in the Draft EIS (DEIS) rather than Alternative E. Alternatives D and E share the same overarching goal of no net unmitigated loss of sage-grouse habitat; however the two alternatives propose different visions of how to achieve this goal. The SEC is concerned about the BLM's proposal of a blanket policy to exclude new recreational facilities, utility-scale wind and solar energy facilities, salable mineral development, non-energy leasing minerals, and no-surface occupancy restrictions for fluid minerals, in all sage-grouse habitat. This appears to be regardless of sage-grouse population density, consideration of seasonal habitat requirements, or importance of habitat to individual populations. These proposed actions contradict BLM's and USFS' multiple-use mandate, governed by the Federal Land Policy and Management Act of 1976 and National Forest Management Act of 1976 respectively.

The SEC recommends the BLM/USFS consider Alternative E's hierarchical decision process of "avoid, minimize, and mitigate" to achieve no net unmitigated loss of sage-grouse habitat in the selection of the final alternative. This includes the SETT consultation process and the Conservation Credit System to assure that this policy is applied consistently throughout the state. The SEC believes this is the best approach because it is pragmatic and effective for achieving sage-grouse conservation, while maintaining the culture and economic vitality of the state.

The BLM/USFS have requested more detail and specificity on elements of the State Alternative to assist in your analysis. To this end, the SEC has approved revisions to the State Plan, and Alternative E, which include more detail on the "avoid, minimize, mitigate" policy and SETT consultation, Site Specific Consultation Based Design Features (further developed from BLM/USFS' Required Design Features), and adoption of sage-grouse habitat objectives (Table 2.6 in the DEIS). The SEC encourages the BLM/USFS to thoughtfully consider these changes when selecting the final plan. The SETT has already submitted these documents to your staff. Please continue to work with them to incorporate these revisions into the Final EIS.

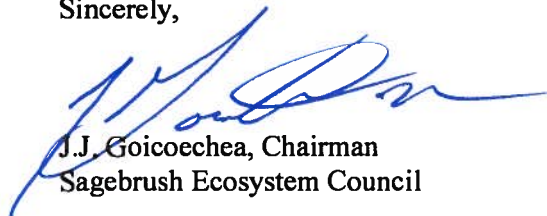
The SEC strongly supports the concept of multiple-use on public lands and is opposed to alternatives that partly or wholly eliminate land uses. Federal law specifically allows certain uses (e.g. grazing, mining, wild horses, and renewable energy) which must be recognized in the selection of the preferred alternative.

In order to provide a more robust description of proper livestock grazing for the BLM/USFS to consider in this section, the SETT is currently working closely with their Science Work Group to develop a revised version of the livestock grazing section of Alternative E based on the best available science. The SETT will continue to work with BLM/USFS staff members to incorporate these revisions into the Final EIS.

In addition the SETT, on behalf of the SEC, will be submitting more detail on the Conservation Credit System, draft Habitat Suitability Map developed by USGS, and updated management maps with revised management categories, for inclusion and consideration in the Final EIS. Please continue to work with the SETT to incorporate these items into the Final EIS.

Specific and detailed comments on the DEIS are attached. The SEC encourages the BLM/USFS to thoughtfully consider the revisions to Alternative E while selecting the final plan for the Final EIS. Thank you again for your time and consideration regarding this matter. If you have any questions concerning these comments, please don't hesitate to contact the SETT at 775-684-8600.

Sincerely,



J.J. Goicoechea, Chairman  
Sagebrush Ecosystem Council

cc: The Honorable Brian Sandoval, Governor  
Mr. Ted Koch, State Supervisor USFWS  
Mr. Leo Drozdoff, Director Department of Conservation and Natural Resources  
Mr. Tony Wasley, Director Nevada Department of Wildlife  
Mr. Jim Barbee, Director Department of Agriculture  
Mr. Jim Lawrence, Administrator Division of State Lands  
Mr. Tim Rubald, Sagebrush Ecosystem Program Manager