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STATE OF NEVADA
Sagebrush Ecosystem Program

January 17, 2014

USFWS Mountain-Prairie Region
Ms. Nicole Alt, Deputy ARD Ecological Services
134 Union Blvd, Ste 400
Lakewood, Colorado 80228

Sent via email to nicole_alt@fws.gov

Dear Ms. Alt,

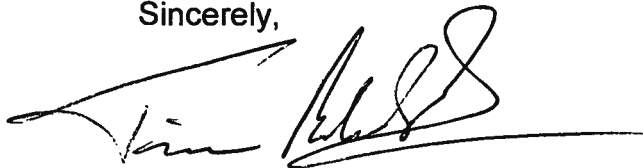
We have reviewed the most recent version of the USFWS proposed "Sage-grouse Quantitative Metrics for Conservation Efforts, Draft 1.9.2014". We offer the following comments on the referred document:

1. There appear to be no metrics that capture Nevada's avoid, minimize, and mitigate policy. For instance, there should be metrics to report acres of disturbance impacts avoided, or minimized through Design Features/BMPs, or off-set through compensatory mitigation through our Conservation Credit System. These may be issues that could be included in the narrative section; however since it is quantifiable, there should also be appropriate metrics developed in the proposed database structure so all of these items can be reported appropriately.
2. It appears that the current document is somewhat arbitrarily making a distinction between native and non-native seed mixes for fire rehabilitation and presumably mixes that could be used for habitat reinvigoration projects. In many areas of the Great Basin, the current "native seeds", many of which are actually produced in Canada, simply do not work or are not available. Many natives are also less competitive with cheatgrass than many non-natives, which is why oftentimes we use non-natives for these purposes. We also believe that distinguishing between native and non-native seed mixes, does not meet USFWS' own criteria of "biologically significant data" as specified in the proposed document. Fire, the vector for cheatgrass invasion, is our highest threat to sage-grouse in Nevada, as stated many times by USFWS personnel. If the use of non-natives, which when looked at from a finer level than just the species designation (i.e. where they originate from), almost all of the seeds used for these activities are, were to "count less" in our efforts, this would be counterproductive for sage-grouse and many of our efforts.

Thank you for the opportunity to comment on this document. Please don't hesitate to contact either myself or Melissa Faigeles of the Nevada Sagebrush Ecosystem Technical Team (SETT). Melissa, our ecologist and watershed specialist for the SETT, also works with the state metrics group working with WGA and USFWS regarding the development of these reporting metrics. She was the primary author of these comments. Melissa can be reached by email at mfaigeles@sagebrusheco.nv.gov and I can be reached at timrubald@sagebrusheco.nv.gov. Our telephone contact information is listed above.

We look forward to our continued work on this process and are available any time for further discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Rubald", with a long horizontal flourish extending to the right.

Tim Rubald,
Program Manager

C: Mr. Leo Drozdoff P.E., Director DCNR
Mr. Cory Hunt, Governor Sandoval's Office
Mr. Jim Lawrence, Administrator, State Lands
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