

April 11, 2014

The Honorable Sally Jewell
Department of the Interior
1849 C Street NW
Washington, DC 20240-0001

Dear Secretary Jewell:

As Nevada's elected officials concerned with the impending decision by the U.S. Fish & Wildlife Service (FWS) on whether to propose listing the Greater sage-grouse as threatened or endangered, we are writing to you today to request a report of the Greater sage-grouse habitat management and rehabilitation actions the Departments of the Interior and Agriculture have undertaken since 2011, including but not limited to, wildfire suppression and restoration, hazardous fuels and invasive species reduction, removal of wild horses and burros, and predator control throughout the state of Nevada. We also request the Departments' future habitat management and rehabilitation plans and FWS-approved regulatory mechanisms to improve the sagebrush steppe throughout the state of Nevada. Additionally, we request to know if the Departments have conducted or plan to conduct an economic analysis of the costs and benefits of listing the Greater sage-grouse as threatened or endangered, and if so, to receive a copy.

Pursuant to the 2011 Department of Interior court-ordered settlement, the FWS must decide whether to propose the Greater sage-grouse as threatened or endangered by September 2015. A listing of the bird will affect 11 western states, including more than 20 million acres within Nevada. Although not responsible for the primary threats to the birds' habitat in Nevada, the major ramifications of such a decision will fall disproportionately on our rural counties, ranching communities and mining operations that use both federal lands and private lands within sage-grouse habitat. However, the responsibility of the health of Nevada's sagebrush ecosystem and rangeland—the critical habitat of the Greater sage-grouse—falls almost entirely on the federal land managers that control over 85% of the land in Nevada. While we understand the Bureau of Land Management (BLM) and the U.S. Forest Service are in the process of making Resource Management Plan amendments to address some habitat concerns, we fear that the further restriction of multiple-use of public lands without dealing successfully with wildfire, invasive species, and wild horses and burros may not be sufficient to meet the goal of preventing a threatened or endangered listing of the species under the Endangered Species Act (ESA).

In the Conservation Objective Team's (COT) report published in February 2013, the FWS identified the loss and fragmentation of sagebrush habitats as the primary threat to the Greater sage-grouse. While human activity may have contributed to fragmentation in other areas of the West, the BLM and the FWS recognize wildfire and the resulting spread of invasive species as the leading cause of sagebrush loss in Nevada. As 84% of the Greater sage-grouse habitat management in Nevada is the responsibility of the Departments of the Interior and Agriculture, we feel an explanation of how the federal agencies are addressing rangeland health—specifically pre-suppression and suppression of wildfire, habitat rehabilitation in burned areas, and the removal of nonnative species and wild horses and burros—is necessary.

Additionally, we write to express concerns with the COT Report and its inconsistency in identifying threats to habitat as identified in the National Technical Team Report titled, "A Report on National Greater Sage-Grouse Conservation Measures" (NTT report). The NTT report identified the Departments' lack of sufficient regulatory mechanisms to conserve sage-grouse and their habitats as the

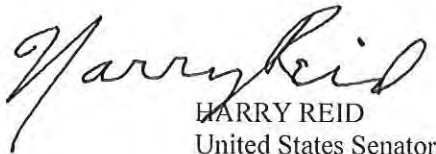
primary reason leading to the FWS' warranted but precluded finding in 2010. While specific regulatory mechanisms are not addressed in the COT Report, it does state federal land management agencies are working to develop those mechanisms. However, the establishment of regulatory mechanisms without incorporating state and local government plans to balance conservation and economic development will have a negative effect on the success of this multi-state conservation initiative. In December 2011, then Secretary Salazar invited the states to "take action that could preclude the need to list this species by effectively addressing the principal threats to its survival." In light of and even prior to this invitation, Nevada and other states have expended considerable resources to develop collaborative management plans that address the principal threats, conserve the species, protect multiple-use, and support our traditional ways of life. We would hope that the Departments will allow the BLM and the Forest Service to continue with their stated commitment to work in a constructive and transparent fashion with the state as requested by FWS Director Dan Ashe in his prefacing memorandum to the COT Report. We are also concerned that, due to the court-ordered listing deadline, the Departments and FWS are not able to give due credence to the states' good faith efforts to manage and keep species off the Endangered Species list.

Finally, it is further troubling the Nevada State BLM Office did not prioritize their Fiscal Year 2014 and 2015 budget requests to adequately address these major threats to sage-grouse habitat in light of the impending bi-state distinct population segment and greater sage-grouse Endangered Species listing decisions. Moreover, the Department's FY15 budget request chose not to fund \$500,000 of NEPA ready fuels management projects in the Humboldt-Toiyabe National Forest for bi-state sage-grouse conservation that were developed in collaboration with the FWS, BLM, USFS, NRCS, Nevada Department of Wildlife and California Department of Fish and Game.

As Nevada's elected representatives, we have worked together in a bipartisan manner to balance wildlife protection and conservation with economic development in Nevada. We are committed to helping our state's wildlife populations thrive alongside our growing economy and hope to see the Greater sage-grouse flourish in Nevada for years to come. However, far more than "unprecedented" collaboration, we need the active participation, cooperation and assurances of our federal land and wildlife agencies in order to achieve these goals. The magnitude of this issue is too great, and given the deleterious impacts that a potential listing of the Greater sage-grouse would have to the economies of several Western states, we simply cannot afford for the Departments to delay appropriate management action on this issue.

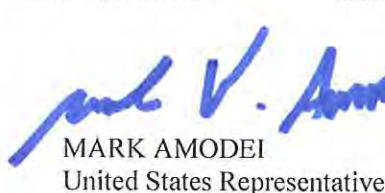
Thank you for your time and swift response. If you need any additional information, please contact any of our offices.

Sincerely,


HARRY REID
United States Senator


DEAN HELLER
United States Senator


BRIAN SANDOVAL
Governor of Nevada


MARK AMODEI
United States Representative


STEVEN HORSFORD
United States Representative

CC: The Honorable Tom Vilsack