



## EUREKA COUNTY BOARD OF COMMISSIONERS

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*PO Box 694, 10 South Main Street, Eureka, Nevada 89316*

*Phone: (775) 237-7211 ♦ Fax: (775) 237-5212 ♦ [www.co.eureka.nv.us](http://www.co.eureka.nv.us)*

May 13, 2015

Mr. John Ruhs, Acting State Director  
Nevada Bureau of Land Management  
1340 Financial Blvd.  
Reno, Nevada 89502

RE: 1610 (NV930); Input on Sage-Grouse LUPA ADFEIS

Dear Mr. Ruhs:

We submit this letter to you as Eureka County's input on the Greater Sage-Grouse Land Use Plan Amendment Administrative Draft Final EIS (ADFEIS).

First, we note our preliminary input provided through a letter dated May 6, 2015. This letter asked for an extension of time to review the ADFEIS. To date, we have not received a response to this request. Further, the letter focused on the overwhelming failure of BLM/USFS to adequately coordinate with Eureka County to include our proposals to the maximum extent possible and strive for consistency with our local plans, policies, and controls. We again ask that BLM/USFS properly and adequately coordinate with us to incorporate changes for maximum consistency with our local plans, policies, and controls before the Final EIS is published.

Given the exacting timeframe cavalierly imposed by BLM/USFS for review and comment on the ADFEIS, we found it impossible to construct any specific comments. BLM/USFS has had months—in fact over a year—to make changes to the EIS. Yet Eureka County and other local government cooperating agencies were provided less than two weeks for review, digestion of the material, and construction of meaningful comments. This underscores the BLM's efforts all along in "going through the motions" to reach a pre-determined outcome while largely ignoring Nevada's local governments.

We recognize that many changes were made and assert that the changes made, especially related to habitat maps and associated restriction categories and disturbance caps, are too substantial to simply move from the public draft EIS to a final EIS. Given the EIS changes, reorganization, and incorporation of new analysis and information, BLM/USFS must provide a revised public draft EIS for full public participation and proper coordination and involvement of cooperation agencies.

Additionally, Eureka County never received a response to our comments on the DEIS. It is difficult to provide additional input into the ADFEIS without having an understanding on why changes were or were not made according to our previous comments. We cannot evaluate any changes in the ADFEIS in context without being able to compare with our previous comments. We ask BLM/USFS to provide us with the specific responses to our previous comments. We find that the predominance of our comments on the DEIS still apply to outstanding issues in the ADFEIS. We will not repeat these comments and fully expect BLM/USFS to

adequately coordinate with us to reach the obligations to reach consistency with our proposals, plans, policies, and controls. We ask BLM/USFS to read and familiarize itself with Eureka County's comments on the DEIS and adequately coordinate with us to incorporate changes in the EIS to address these comments and reach consistency with Eureka County. We request at least a full day to conference with BLM/USFS on these outstanding issues and find consensus on a path forward before the Final EIS is published.

Eureka County does support conservation of Greater Sage-Grouse and the sagebrush ecosystem. We also value positive, working relationships with BLM/USFS and other agencies. As you know, we are at a turning point in the West that hinges on the Greater Sage-Grouse. The EIS process to this point has not worked. It has not built the necessary bridges or positive partnerships to accomplish sustainability of the rangelands and our local economies and livelihoods. A large bulk of the provisions being proposed in the EIS for management of sage grouse will not work, will not result in benefit to the bird, the resource, or the socioeconomics of Nevada. All the EIS is doing in pushing the issue to be determined through court where we may all lose close-to-home control of the management. Please take the time now to work with Nevada communities to do what is right and keep the control as close to the people affected as possible by finding maximum consistency with the local government plans, policies, and controls.

Respectfully,



J.J. Goicoechea DVM, Chairman  
Eureka County Board of Commissioners

cc: BLM Director Neil Kornze  
US Congressman Mark Amodei  
US Senator Dean Heller  
US Senator Harry Reid  
NV Governor Brian Sandoval  
NV Senator Pete Goicoechea  
NV Assemblyman John Ellison  
NV Sagebrush Ecosystem Council  
NV Association of Counties  
NV State Land Use Planning Advisory Council  
Lauren Mermejo, BLM/USFSLUPA Project Manager, NV/NE CA Sub-region