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**SAGEBRUSH ECOSYSTEM PROGRAM  
NOV 16 2015**

November 02, 2015

The Honorable Governor Brian Sandoval  
101 N. Carson Street  
Carson City, NV 89701

RE: Esmeralda County's concerns with, and objections to, any BLM Land Use Plan Amendment based on the Greater Sage-grouse Bi-state Distinct Population Segment Forest Segment Forest Plan Amendment Final Environmental Impact Statement (FEIS) dated February 2015.

Dear Governor Sandoval,

Approximately 50% of the land surface in our county was covered by the Greater Sage-grouse Bi-state Distinct Population Segment Forest Plan Amendment Final Environmental Impact Statement (FEIS) dated February 2015.

We appreciate that our county review of inconsistencies between our local plans was submitted during your consistency review for the Record of Decision issued by the Humboldt-Toiyabe Forest for this project.

There are numerous concerns and objections Esmeralda County has with the process used, all included in our comments submitted to the USFS. One being that there are no lands within our county that are managed by the Humboldt-Toiyabe Forest. This being the case, our legal standing to formally object to a Record of Decision that only applies to USFS managed land was questionable. As far as we have been able to determine the Bureau of Land Management has not issued any ROD based on this report leading us to believe that the BLM probably intends to implement these standards and guidelines via RMP revisions. Another objection we commented on was the lack of public notice and involvement afforded to our citizens.

We submitted many comments as to economic impacts, the habitat areas identified, and asked for inclusion in the action plan a clear statement about who, and when the habitat areas would be updated. We focused on these areas because of how the data was presented and interpreted. The economic impacts were deemed to be minimal due to the fact that the economic analysis lumped all the Nevada counties together so that the economy of a populous Douglas County which is not mining and agriculture based far outweighed ours which is almost totally reliant on these two sectors. We also disputed the habitat shown because based on the information we have received the majority of the habitat areas identified within Esmeralda County in the FEIS are based solely on vegetation and aerial survey, not by actual location of the species and data on the physical locations of the Sage Grouse in the White Mountain DPS. Data on this population in this FEIS and in the USFWL findings is

virtually non-existent. Actual sighting information from NDOW and the Inyo National Forest confirm our contention that sage grouse is only present in our county adjacent to the White Mountain chain and no sightings or population exist east of the Fish Lake Valley.

Much as with your considerable data that was submitted during the Governor's consistency review of the Greater Sage Grouse Land Use Plan Amendment authored by the BLM the majority of our comments were unacknowledged and/or unanswered.

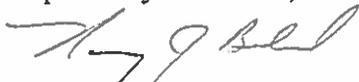
The timing of both the Greater Sage-grouse Bi-state Distinct Population Segment Forest Plan Amendment and the Greater Sage Grouse Land Use Plan Amendment is troubling to us. Both studies were conducted prior to any decision by the U.S. Fish and Wildlife Service as to whether or not these birds should be listed and the Records of Decision for these studies were release concurrent with the final decision by USFWS. During the comment period it seemed that the listing would occur. It is our belief that the standards and guidelines included in these decisions constitute a de-facto listing.

Esmeralda County strongly supports conservation and management measures expressed in the State Plan that support the species and their habitat where these truly exist. Our county is amongst the most pristine of all in Nevada and preservation of this status is a high priority to our government and our citizens. We also believe that the best way to achieve this is with the input, consent and knowledge of those who know this environment best, those that live, and work here. The damage to the environment in our county has been due to the actions, inactions, and decisions by federal agencies.

We are extremely frustrated and distressed over the long term and ongoing lack of respect for state and local governments and their plans and policies by both the USFS and BLM despite the requirements of NEPA and their own regulations. But since the agencies get to determine what is relevant it appears that our input is not. What is relevant to them are lawsuits which seem to drive their actions and decisions.

To date the revision to our BLM Resource Management Plan has yet to be completed so we envision that when work again commences on it we will be offered further opportunity to have our input incorporated. If it turns out that once again the local and state plans are disregarded and the decision is based on the "Greater Sage-grouse Bi-state Distinct Population Segment Forest Segment Forest Plan Amendment Final Environmental Impact Statement (FEIS) dated February 2015" we may find that we will need to plead to you as our most powerful state elected official to join your voice with ours to advocate for the wisdom contained in the State Plan and our local plans and ask as have other counties in our state to defend the long-term socioeconomic stability and way of life that makes Nevada great.

Respectfully submitted,



Nancy J. Boland, Chair  
Esmeralda County Board of Commissioners

Cc:	NV Sagebrush Ecosystem Council	Senator Dean Heller
	NV Association of Counties	Senator Harry Reid
	NV Boards of County Commissioners	Congressman Cresent Hardy
	Nevada Senator Don Gustavson	Nevada Assemblyman Ira Hansen
	Attorney General Adam Laxalt	