

Background:

The State of Nevada’s Sagebrush Ecosystem Program finalized the *2014 Nevada Greater Sage-grouse Conservation Plan* in October 1, 2014. The State designed their plan to “eliminate the threats facing [GRSG] while balancing the economic and social needs of the residents of Nevada through the use of ‘avoid, minimize and mitigate’ with additional offsite mitigation being accomplished by the use of the Nevada Conservation Credit System.” In response to Secretarial Order 3353, BLM Nevada reviewed its 2015 Approved Resource Management Plan Amendment (ARMPA), the State’s Conservation Plan, and the seven national Instruction Memorandum that were released in September 2016. For the purposes of identifying inconsistencies between the State and Federal Plans, BLM Nevada also reviewed the Governor’s Consistency Review conducted in June/July 2015. The topic areas identified in the following tables are a result of this review with the State of Nevada.

BLM Nevada’s discussions with the State of Nevada on this exercise also included the Humboldt-Toiyabe National Forest, as their 2015 plan amendment was developed and analyzed in tandem with BLM’s plan amendment. Responses from the Humboldt-Toiyabe National Forest are identified in **green** text.

Issue Descriptions and Recommendations:

Topical Area 1		Sage Grouse Habitat Management Area Maps	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
<p>Since the release of BLM Nevada and California’s Approved Resource Management Plan Amendment (ARMPA), the State of Nevada (in cooperation with the U.S. Geological Survey, Dr. Pete Coates et. al) updated GRSG habitat maps in 2016 for the Nevada and Northeastern California subregion. The State of Nevada (specifically NDOW and the Department of Conservation and Natural Resources), and counties are already actively using the 2016 habitat management maps to implement the 2014 Nevada Sage-Grouse Conservation Plan while BLM Nevada and California sage-grouse land use plan amendment goals, objectives, and management decisions are tied to an older version of GRSG habitat maps that were the basis of the GRSG habitat management areas, as defined in the 2015 ARMPA.</p> <p>This is inconsistent with the Nevada Sage-Grouse Conservation Plan, which recognizes that mapping habitat management areas <i>“is iterative and is intended to inform and better define aspects of the State Plan. To that end, the habitat and management mapping process will be reviewed and refined every 3 to 5 years. New or improved spatial data (e.g., additional sage-grouse telemetry data, updated or improved vegetation community data) will be incorporated during the refinement process.”</i></p> <p>During a meeting with Governor Sandoval on December 4, 2015, then Department of the Interior</p>			

Secretary Sally Jewell “committed to formally adopt the maps in the most expeditious manner possible.” However, since that commitment, the Department of Interior has yet to adopt the newly updated maps.

The Humboldt-Toiyabe National Forest GRSg plan amendment (HTNF Plan) and management decisions are also tied to the older version of the GRSg habitat maps. In addition, the HTNF Plan includes definitions of “leks” that are inconsistent with the BLM and State of Nevada’s definitions, making it difficult to crosswalk the application of plan standards and guidelines. Finally, requirements for lek surveys in and surrounding proposed project areas (GL-GEN-008) are inconsistent with those of the BLM.

Please Provide Next Steps to All that Apply

<p>Clarification, Training, and other suggestions (less than new policy or plan changes)</p>	<p>Issue clarification (IB) to BLM state, district, and field office staff as to what to do between now and when the new maps are adopted (i.e. how to use the 2016 maps as best available science when conducting site specific (project) NEPA in GRSg habitat).</p>
<p>Policy</p>	<p>Attempt to find a long term sustainable solution as to the appropriate applications for the habitat maps and how the maps can be updated to reflect the best science in the land use plan amendments without conducting an extensive amendment.</p>
<p>Plan Changes</p>	<p>The BLM needs to amend the plans (or use plan maintenance if appropriate) to adopt the most current habitat maps and also determine how to have this happen in the future as the habitat changes. Minor changes could be conducted through plan maintenance, but major changes require a plan amendment. “Minor” and “major” are not defined in BLM’s planning regulations since the specific resource and context involved are key factors in determining what these terms means.</p> <p>The HTNF Plan would most likely require an amendment to adopt current habitat maps because the change would affect where plan components (e.g., standards and guidelines) apply. The HTNF should complete an administrative correction to adopt consistent definitions for leks and consistent requirements for lek surveys for project areas.</p>
<p>Other</p>	<p>N/A</p>

Topical Area 2		Sagebrush Focal Areas	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
<p>The Sagebrush Focal Areas (SFAs) are inconsistent with the State of Nevada’s Greater Sage Grouse Conservation Plan, which does not include any similar type of designation that recommends habitat management areas for mineral withdrawal or closure. Instead, the State of Nevada’s Conservation Plan uses a mitigation hierarchy (avoid, minimize, and mitigate) to ensure any anthropogenic disturbances in habitat management areas (not just the ‘best of the best’ in the State) <i>achieves a net conservation gain</i>. The State of Nevada believes this more site specific and science based approach will achieve a net conservation gain while allowing for appropriately well planned development within habitat management areas (including the SFAs), as long as mitigation connected to a development is vetted through the State’s robust Conservation Credit System (or other similar system).</p> <p>A side note here is that during final completion of the Nevada Sage-Grouse Conservation Plan, the State was advised by our federal partners that our plan would not be accepted without achieving a “net conservation gain.” Our preference is for revised language requiring “no net unmitigated loss.”</p> <p>The HTNF Plan also includes SFAs; the Forest Service is cooperating with the BLM on the environmental analysis for SFA withdrawal from mineral entry.</p>			
Please Provide Next Steps to All that Apply			
Clarification, Training, and other suggestions (less than new policy or plan changes)	N/A		
Policy	N/A		
Plan Changes	Amend/Maintain the plan amendment and remove the SFA designation boundaries. If this is not possible, see the cell below.		
Other	<p>There are management decisions set forth in the ARMPA that prioritize restoration activities and livestock grazing permit renewals in the SFAs, the Secretary should call upon the State of Nevada, local stakeholders, and BLM Nevada to work together to create a defensible method for identifying areas that are the “best-of-the-best” for prioritizing BLM driven activities.</p> <p>The HTNF should also be included in any process to address SFAs and/or identify areas that are the “best-of-the-best” on National Forest System lands.</p>		

Topical Area 3		Disturbance Caps	
Bold All that Apply			
Scope	Rangewide	Regional	State

Describe the Issue	
<p>The State of Nevada’s Conservation Plan states that all <i>“anthropogenic disturbances should be avoided in habitats within the SGMA [Sage Grouse Management Areas]. If project proponents wish to demonstrate that a disturbance cannot be avoided, exemptions will be granted if the criteria listed in the table [Table 3-1] can be met for the applicable management category.”</i> The BLM’s ARMPA however calls for no further discrete human disturbances to be authorized if disturbance at either the biologically significant unit or project area scale exceeds 3% disturbance. This is a clear inconsistency with the State of Nevada’s Conservation Plan. Disturbance caps are incompatible in Nevada for two reasons: 1) they fail to account for the quality of habitat and seasonal habitats used by the grouse (which the State’s CCS places significant consideration on) and 2) does not incentivize co-location of disturbances if an area (BSU or project area) already exceeds 3% disturbance, thus promoting new disturbances in undisturbed PHMA and/or GHMA which are important to the State.</p> <p>The HTNF Plan includes the same 3% anthropogenic disturbance limit as the BLM. The Forest Service definition of anthropogenic disturbance is inconsistent with the BLM definition even though disturbance calculations are done cooperatively.</p>	
Please Provide Next Steps to All that Apply	
Clarification, Training, and other suggestions (less than new policy or plan changes)	N/A
Policy	N/A
Plan Changes	<p>Amend/Maintain the plan amendment and remove the 3% disturbance cap, specifically at the project analysis scale. In its place, require anthropogenic disturbing activities be quantified through the Nevada Conservation Credit System, which adequately evaluates the quality of habitat and the availability of seasonal habitat types.</p> <p>The HTNF Plan should be amended or corrected consistent with the BLM. The Forest Service should complete an administrative change for the definition of anthropogenic disturbance.</p>
Other	N/A

Topical Area 4		Exclusion/Closed Land Use Plan Allocations	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
<p>In the Nevada portion of the ARMPA, PHMA and GHMA are exclusion areas for wind and solar energy development, are closed for salable and non-energy leasable development, and in the event a hard adaptive management trigger is tripped at a biologically significant unit scale, high-voltage</p>			

transmission line rights-of-way would be excluded in PHMA.

The Nevada Sage-Grouse Conservation Plan utilizes a rigorous "avoid, minimize, and mitigate" process to deter disturbance activity in priority habitat. Residual disturbance impacts that cannot be avoided or minimized to a level of non-significance are mitigated through the Conservation Credit System which quantifies functional acres of mitigation that are mapped and verified on the ground, and incorporate specific mitigation factors for existing habitat quality, distance criteria and many other parameters in the calculation of debits and credits to ensure net conservation gain.

Nevada worked with USGS to create the habitat maps for use with the Conservation Credit System (CCS) to be able to quantitatively assure that the highest value habitat (measured in functional acres) would require highest levels of mitigation. Nevada does not use the management categories for prescribing land use allocations, exclusions or closures. The mapping results depicted as PHMA, GHMA, and OHMA do not necessarily reflect local or site-scale (on-the ground) conditions, but are the output of a complex GIS modeling exercise that analyzes more than 50 variables simultaneously and calculates a habitat suitability index that is intersected with the space use index to create management categories in the following way.

- Areas with high habitat suitability intersected with high space use are PHMA;
- Areas with high habitat suitability intersected with low space use or areas of non-habitat intersected with high space use are GHMA; and
- Areas with moderate habitat suitability intersected with low space use are OHMA.

The results of the GIS model in and of themselves do not denote areas that require closure, exclusion, or imply any kind of specific management recommendations. In the ARMPA, resource management decisions based on the management category maps alone do not incorporate other important factors that are pertinent to finding the appropriate management actions to achieve local-scale multiple use objectives. The Nevada Plan primarily uses the mapped habitat categories to prioritize management actions such as wildfire suppression and rehabilitation, PJ removal, and wild horse management.

The HTNF Plan includes the same or similar exclusions and restrictions for energy and mineral development.

Please Provide Next Steps to All that Apply

Clarification, Training, and other suggestions (less than new policy or plan changes)	N/A
Policy	N/A
Plan Changes	Amend/Maintain the plan amendment to allow for some level of disturbance provided that a net conservation gain can be achieved. The State of Nevada recommends that BLM adopt a multi-scale planning approach rather than a complete closure or exclusion of activities through land use plan allocations attached to the existing mapped habitat management areas.

	The HTNF Plan should be amended or corrected consistent with the BLM.
Other	N/A

Topical Area 5		Valid Existing Rights with Closures and Exclusions	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
<p>The Nevada Sage-Grouse Conservation Plan does not use closures or exclusion areas due to the rigor of the Conservation Credit System to deter disturbances in the most important sage-grouse habitat by requiring the highest levels of mitigation, with assurances to achieve a net conservation gain. Closures and exclusion in the ARMPA are qualified by the use of the term “valid existing rights.” The varied use of this term is confusing and creates uncertainty. It is critical that a definition and efficient process for determining “valid existing rights” is developed in collaboration with the State.</p> <p>These concerns are also applicable to the HTNF Plan.</p>			
Please Provide Next Steps to All that Apply			
Clarification, Training, and other suggestions (less than new policy or plan changes)	<p>Collaborate with Nevada Division of Minerals and the Nevada Sagebrush Ecosystem Program to clearly and concisely clarify (IB) for both BLM practitioners and BLM stakeholders what constitutes a “valid existing right.”</p> <p>The HTNF should participate in both defining valid existing rights and working with the State of Nevada to ensure consistency across ownership boundaries.</p>		
Policy	<p>Collaborate with the State to determine the objectives for closures and exclusions to assure that these actions are justified over expansive landscape areas.</p>		
Plan Changes	N/A		
Other	N/A		

Topical Area 6		Habitat Objectives	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
<p>The habitat objectives in the ARMPA (Table 2-2) are very similar to the desired habitat conditions for sage-grouse describe in the Nevada Sage-Grouse Conservation Plan. One additional habitat objective is included in the ARMPA that is not present in the State’s Conservation Plan and that is the 7 inch deep rooted perennial bunchgrass (within 200 meters of riparian areas and wet meadows) desired condition.</p> <p>The introductory language between the ARMPA’s Table 2-2 and the State’s Conservation Plan which outlines the intent of the desired habitat conditions (habitat objectives) are also inconsistent and is driving some confusion for stakeholders, particularly the livestock grazing community that depends</p>			

on Nevada rangelands for their livelihood. The Nevada Sage-Grouse Conservation Plan clearly states that the sage-grouse habitat objectives are to be used as guidelines in conjunction with ecological site descriptions and state and transition models as they may not be applicable to all sagebrush communities. In the Nevada Plan, the sage-grouse habitat objectives are not to be used to conduct land health assessments and are not regulatory. The State Plan also point out that the desired habitat conditions should not be reviewed, measured, or managed for independently and that measurements for a single given year should not necessarily be used to adjust management decisions.

Desired habitat conditions for the Forest Service are contained in Tables 1a and 1b, and are not entirely consistent with the BLM habitat objectives in Table 2-2. The HTNF Plan also includes Table 3, grazing guidelines for GRSg seasonal habitat, which includes droop height and stubble height requirements for uplands and mesic meadows. The Forest Service has not provided details on how the direction in this table will be assessed and applied to allotment management.

Please Provide Next Steps to All that Apply	
Clarification, Training, and other suggestions (less than new policy or plan changes)	In the short term, provide BLM practitioners and range users with clarification and training as to the intended uses of the desired habitat conditions as well as the limitations of how they should be interpreted.
Policy	N/A
Plan Changes	Amend/Maintain the plan amendment to match the desired habitat conditions for sage-grouse describe in the State of Nevada’s Conservation Plan. The State’s Conservation Plan includes a desired condition for maintaining a residual grass height that provides for overhead and lateral concealment from predators, but does not identify specific values for those objectives. Amend the HTNF Plan desired conditions tables and grazing guidelines to be consistent with the BLM and current state of knowledge for GRSg habitat.
Other	Collaborate with Nevada state agencies and local stakeholders to define a process for setting feasible desired conditions at the local scale which would include consideration for sage-grouse habitat objectives in conjunction with other existing authorized land uses.

Topical Area 7		Monitoring	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
Use of the Habitat Assessment Framework (in coordination with the habitat objectives table) and how it will be applied in conjunction with other assessment tools is also a concern for the State as			

the BLM proceeds with implementing the ARMPA.

The State is concerned that the magnitude of the monitoring requirements for implementation of the ARMPA is not supported with adequate funding or staff. Nevada also is concerned with the sampling design using random points which will not allow for “use management.” Nevada has provided collaborative monitoring guidance for state and federal agencies through the *Nevada Rangeland Monitoring Handbook* since the 1990s. Considerable data important for interpreting trend exists using the recommended standardized methods which are also included in BLM monitoring handbooks.

These concerns are also applicable to the HTNF Plan.

Please Provide Next Steps to All that Apply

Clarification, Training, and other suggestions (less than new policy or plan changes)	Develop clear and understandable guidance for BLM practitioners and State partners as to how the HAF will be applied and used in conjunction with other tools at the BLM’s disposal, specifically the <i>Nevada Rangeland Monitoring Handbook</i> (Third edition). Complete Nevada state-and-transition model/HAF/rangeland health pilot study to determine how Nevada state-and-transition models can be integrated with land health standards determinations and the HAF.
Policy	N/A
Plan Changes	N/A
Other	Work collaboratively with the Nevada rangeland monitoring scientists and practitioners to incorporate the HAF monitoring protocols with existing monitoring efforts to assure that monitoring will be implemented within existing resource capability and will address the management needs.

Topical Area 8

Mitigation and Consistent Sage Grouse Habitat Baseline Conditions

Bold All that Apply

Scope	Rangewide	Regional	State
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Describe the Issue

The State of Nevada’s Conservation Credit System (CCS) is a pro-active solution that provides net conservation benefits for sage-grouse, while balancing the need for continued human activities vital to the Nevada economy and way of life. Management Decision MIT I in BLM’s ARMPA states that “*In Nevada, coordinate with the SETT on the application of a compensatory mitigation program, such as*

the Nevada Conservation Credit System (CCS) (Appendix N) for mitigating activities that result in habitat loss and degradation of GRS habitat in Nevada, where the application of compensatory mitigation will occur on or the credit will be applied to disturbance on BLM-administered lands.” In April 2015, BLM and the U.S. Forest Service signed a Memorandum of Understanding with the State of Nevada’s Department of Conservation and Natural Resources (DCNR). One commitment made in this MOU was that BLM will analyze the use of the State’s CCS to offset residual impacts to GRS in at least one NEPA alternative.

Since the signing of the MOU and the release of the BLM’s ARMPA, the State of Nevada as a cooperating agency on major locatable mineral projects in GRS habitat, have struggled to effectively comment on mitigation alternatives developed by the BLM, specifically proponent driven mitigation alternatives that do not use the CCS to achieve a net conservation gain for GRS. One reason for this is that other mitigation NEPA alternatives are not utilizing the same robust biological parameters (such as the CCS’ Habitat Quantification Tool) to develop baseline habitat conditions to help identify direct, indirect, and residual impacts to GRS from a proposed activity. In additions, proponent driven mitigation alternatives are not using consistent metrics to quantify disturbance and mitigation. As such, it is difficult to ascertain if the other mitigation proposals are achieving net conservation and how they compare with the CCS alternative.

The HTNF did not commit to analyzing the use of the CCS in at least one NEPA alternative, but did commit to identifying the DCNR as a cooperating agency on projects within PHMA or GHMA. The Forest Service did commit to coordinate with the DCNR to determine if use of the CCS would result in a net conservation gain for projects which may result in residual impacts.

Please Provide Next Steps to All that Apply	
Clarification, Training, and other suggestions (less than new policy or plan changes)	Work with the Sagebrush Ecosystem Technical Team and Nevada Department of Agriculture (NDOA) to establish a curriculum and training for all BLM District offices regarding the use of the CCS Habitat Quantification Tool, in an effort to establish consistent science based baseline conditions for NEPA analysis, as well as quantification of conservation gain. This curriculum and training should also be available to NEPA consultants.
Policy	Require BLM staff and their consultants to use the CCS Habitat Quantification Tool for all NEPA alternatives resulting in anthropogenic disturbances in GRS habitat. Reiterate (per the MOU) consultation (at minimum, a pre-application conference) with the Nevada Sagebrush Ecosystem Technical Team to assess the functionality of the habitat proposed to be impacted by developments. Any proponent-driven mitigation must utilize consistent metrics hat are science based, to quantify both baseline, disturbance, and mitigation to achieve conservation gain. <i>As stated previously, the Forest Service has already committed to coordinate with the DCNR to determine if use of the CCS would result in a net conservation gain for projects which may result in residual impacts.</i>
Plan Changes	Amend/Maintain the plan amendment to require mitigation (achieve a net conservation gain to GRS) in OHMA.
Other	N/A

Topical Area 9		Wild Horse and Burro Management	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
<p>While the ARMPA directs the BLM to “manage herd management areas (HMAs) in GRSG habitat within established AML ranges to achieve and maintain GRSG habitat objectives” and “prioritize gathers and population growth suppression techniques in HMAs in GRSG habitat” (ARMPA, Management Decisions WHB 2 and 4), it is not evident that the BLM has prioritized funding to implement these actions which will reduce the present and widespread threat to GRSG that is prevalent throughout the State. As a result of this inaction, there is a perception held by many local stakeholders in Nevada that BLM is more focused on redirecting livestock grazing management rather than the overpopulation of wild horses in areas important to GRSG.</p> <p>The ARMPA perpetuates the fallacy that BLM can manage wild horses and burros under existing policies and conflicts with actions proposed in the State Plan to:</p> <ol style="list-style-type: none"> 1. Reevaluate Herd Areas and adjust to avoid PHMA 2. Reevaluate AML and adjust if necessary <p>The same concern applies to wild horse and burro territories on National Forest System Lands and the associated standards and guidelines in the HTNF Plan (HB-ST-68 and HB-GL-70).</p>			
Please Provide Next Steps to All that Apply			
Clarification, Training, and other suggestions (less than new policy or plan changes)	N/A		
Policy	<p>Work in collaboration with state and local stakeholders to reevaluate existing boundaries for HMAs and HAs for possible realignments to avoid conflicts with PHMA and GHMA.</p> <p>Work in collaboration with state and local stakeholders to reevaluate appropriate management levels and propose justifiable adjustments.</p>		
Plan Changes	N/A		
Other	Recommend that BLM and Forest Service begin to implement the wild horse and burro management actions set forth in ARMPA, consistent with laws and mandates that are already in place.		

Topical Area 10		Adaptive Management	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
The BLM’s ARMPA calls for the use of a USGS GRSG state-space models (Coates et al. 2014) to assess			

the rate of GRSG population growth (increase or decrease in population numbers) and the number of males at individual lek, lek cluster, BSU scales to determine whether or not an adaptive management population trigger will be tripped at a lek, lek cluster, or BSU scale. In the event a hard adaptive management trigger is reached, more restrictive land use plan allocation decisions (as outlined in Table J-1 and J-2 in the ARMPA) will be immediately employed.

The State understands that USGS is currently in the process of adjusting the GRSG state-space model, which will result in newly defined BSU boundaries and updated population triggers. Once USGS is finished finalizing this model, the BLM will then be required to conduct a plan maintenance action or a plan amendment to adopt these new boundaries and numeric triggers. Before this occurs, the State of Nevada recommends that USGS present the model to the Sagebrush Ecosystem Council before the BLM moves forward with conducting any changes. In 2012, Governor Brian Sandoval established the Sagebrush Ecosystem Council (via Executive Order 2012-19 and later approved by the legislature in 2013 as state statute). The council is a nine member body representing all of Nevada’s diverse industries and resources, as well as ex-officio members from Federal and state agency leaders.

In addition to reaching out to the SEC before making any changes to the existing ARMPA’s adaptive management strategy, the State would also like to see a causal factor analysis process established by the BLM before implementing a hard trigger response. Currently, a causal factor analysis process that brings in local stakeholders to assess why a hard trigger is tripped and what the appropriate response is to reverse the trigger is not set forth in the ARMPA or addressed in IM 2016-140. Instead, the ARMPA calls for the BLM to implement a set of allocation decisions (Table J-1 and J-2) that may or may not address the causal factors resulting in the population decline.

The Nevada Sage-Grouse Conservation Plan does not include adaptive management triggers.

The HTNF Plan also calls for use of the Coates state-space models for adaptive management, and changes to the model would be adopted by both the HTNF and the BLM concurrently. The HTNF Plan does not state explicitly where allocation decisions or other management decisions would be applied in the event of a hard trigger. The HTNF does acknowledge the possibility of a causal factor analysis in the event of a hard trigger but does not require it.

Please Provide Next Steps to All that Apply	
Clarification, Training, and other suggestions (less than new policy or plan changes)	As a temporary solution, update IM 2016-140 to allow the BLM to conduct a casual factor analysis before implementing unnecessary hard trigger responses (new land use plan allocations).
Policy	N/A
Plan Changes	Amend/Maintain the plan amendment to address the state-space model changes proposed by USGS and BLM only after the SEC approves the methodology.
Other	Work collaboratively with the State Sagebrush Ecosystem Council and Technical Team to identify hard triggers for adaptive management that are agreed upon and can be incorporated into both the ARMPA and the State Plan.

Topical Area 11		Seasonal Timing Restrictions	
Bold All that Apply			
Scope	Rangewide	Regional	State
Describe the Issue			
<p>Management Decisions SSS 2E and SSS 3D of the BLM’s ARMPA calls for the application of seasonal timing restrictions <i>“to manage discretionary surface-disturbing activities and uses on public lands to prevent disturbing GRSG during seasonal life cycle periods.”</i> In December 2016, BLM Nevada conducted a plan maintenance action to clarify that seasonal timing restrictions only need to be applied to uses on public lands that are <u>disruptive</u> to GRSG, therefore, the application of timing restrictions are no longer necessary to be applied to uses and public activities that do not have a direct or indirect impact on GRSG (i.e. permits to survey bats in PHMA that result in no surface disturbance or noise). However, there continues to be inconsistent interpretations across BLM Nevada District Offices as to what constitutes a “restriction.” For example, some offices interpret a seasonal restriction as a moratorium on any actions to occur on the ground during the seasonal timing periods, while other offices interpret seasonal restrictions as a time to avoid certain activities (i.e. do not travel on roads between the hours of 6:00 am to 9:00 pm during the nesting season).</p>			
Please Provide Next Steps to All that Apply			
Clarification, Training, and other suggestions (less than new policy or plan changes)	Collaborate with the State to develop a range-wide clarifying document that clarifies what a seasonal timing restriction is and how to consistently apply them to protect GRSG during seasonal life cycle periods, while not arbitrarily applying moratoriums for certain uses on public lands.		
Policy	N/A		
Plan Changes	N/A		