

STEVE SISOLAK
Governor

Sagebrush Ecosystem Program

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STATE OF NEVADA
Sagebrush Ecosystem Program

July 17, 2019

Klete Fallowfield
Geologist/Environmental Specialist
Haliburton Energy Services – Rossi Mine
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Mr. Fallowfield;

We were recently made aware of the Rossi Project and the associated Final Environmental Impact Statement (FEIS).

The State of Nevada's Sagebrush Ecosystem Technical Team (SETT) completed an initial desktop analysis of the proposed project that was analyzed through the NEPA process during the Draft EIS. Our analysis did not include site scale data collection and was conducted using version 1.3 of the Conservation Credit System's guidance documents. That analysis concluded that the approximate credit obligation would be 437 to 503 functional acres (debits) of Greater Sage-grouse (GRSG) habitat would be impacted by the project.

As you may be aware, the State of Nevada, through the Governor appointed Sagebrush Ecosystem Council, adopted regulations requiring mitigation of impacts to GRSG habitat on all public lands that are the result of certain anthropogenic disturbances. Specifically the regulations require "Mitigation of residual direct or indirect anthropogenic impacts resulting in potential habitat loss or degradation as defined by the Nevada Greater Sage-Grouse Conservation Plan and the Nevada Conservation Credit System, within Greater Sage-Grouse Habitat Management Areas is required when the anthropogenic disturbance is subject to state or federal review, approval, or authorization, as ordered by Nevada Executive Order 2018-32, signed on December 7, 2018."

Based on our conversations with the Bureau of Land Management State Office, we understand that it is the responsibility of the project proponent to comply with these state regulations in order to stay in compliance with NEPA, which requires adherence to all applicable state and local laws and regulations.

I would like to extend an invitation to you to meet with us at your earliest convenience to discuss the project, review our analysis of the impacts, and potential mitigation options using the CCS to ensure compliance. We are very sensitive to any timing concerns that you may have regarding how adherence to these regulations may or may not impact the project schedule. As such, we believe it important to meet soon so as to avoid any unnecessary delays.

I look forward to talking with you in more detail about our analysis and review potential mitigation options. My contact information is below and you can find more information regarding our program at sagebrushco.nv.gov.

Sincerely,



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Attachments: Mitigation Regulation