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**STATE OF NEVADA**  
**Sagebrush Ecosystem Program**

**SAGEBRUSH ECOSYSTEM COUNCIL**  
**STAFF REPORT**  
**MEETING DATE: April 22, 2013**

**DATE:** April 17, 2013

**TO:** Sagebrush Ecosystem Council Members

**FROM:** Melissa Faigeles, Watershed Restoration Specialist, State Lands  
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**THROUGH:** Tim Rubald, Program Manager, State Lands  
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**SUBJECT:** Discussion of USFWS Draft Comments on Nevada's State Plan for the Conservation of Greater Sage-Grouse and Recommendations to Address Issues Identified by USFWS

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**SUMMARY**

This item provides an update to the Sagebrush Ecosystem Council (SEC) on a meeting held between the Sagebrush Ecosystem Technical Team (SETT), U.S. Fish and Wildlife Service (USFWS), and Nevada Department of Wildlife (NDOW) staffs as directed by the Council to discuss the USFWS comments on the 2012 Nevada Strategic Plan for Conservation of Greater Sage-Grouse (the Plan). At the meeting it was determined that USFWS found that the Plan, as currently written, is not developed sufficiently for the USFWS to be able to assess how concepts would be effectively applied on the ground for conservation of the greater sage-grouse. USFWS desired clarification and greater detail on a number of concepts in the Plan, including: mapping methods used, proposed regulatory mechanisms, the concepts of "avoid, minimize, mitigate" and "no net loss", and cumulative impacts to habitat loss due to "Acts of God". The SETT recommends addressing these issues by: revising the State Plan and Nevada State alternative for the BLM EIS, updating the sage-grouse management areas, and developing the Mitigation Crediting System as a regulatory mechanism to ensure conservation of sage-grouse habitat.

**PREVIOUS ACTION**

**March 27, 2013.** The Council directed staff to meet with USFWS and NDOW staffs to discuss the USFWS comments to the Nevada State Plan and report back to the Council.

## **BACKGROUND**

On September 14, 2012 the U.S. Fish and Wildlife Service (USFWS) released an informal draft comments document on the 2012 Nevada Strategic Plan for Conservation of Greater Sage-Grouse (the Plan). At the March 27, 2013 meeting of the State of Nevada Sagebrush Ecosystem Council (SEC) that document was discussed and the SEC unanimously voted for the Sagebrush Ecosystem Technical Team (SETT) to meet with USFWS and Nevada Department of Wildlife (NDOW) staffs to discuss the comments and report back to the SEC at their next meeting. The five members of the SETT held a meeting with Steve Abele (USFWS) and Steve Siegel (NDOW) to discuss the comments.

At the meeting Mr. Abele, the author of the original comments, elucidated that the USFWS did not object to the overall conceptual framework of the Plan, with exception of the management area mapping methods used, but that it lacked the detail and consistency in application necessary for USFWS to evaluate it as an adequate regulatory mechanism for the 2015 Greater Sage-Grouse listing decision. Regulatory mechanisms need to be developed and consistently implemented that effectively ameliorate threats to sage-grouse habitat and subsequently stabilize sage-grouse population. The specifics of the Plan would need to be further developed and fleshed out prior to the listing decision. The main topics discussed at the meeting are outlined below:

### *Mapping*

It is unclear to the USFWS staff the process and methods used to derive the Nevada Sage-Grouse Management Areas from the NDOW Habitat Categories. Specifically, there is no discussion provided as to why large extents of habitat included in the NDOW Habitat Categories were excluded from the State Management Areas. In the opinion of some USFWS staff, the NDOW map has a documented scientific method and approach, while the State map appears more arbitrary and lacks consistency in methods used to determine management areas boundaries. USFWS would need clarification on the mapping process and justification for the methods used.

The USFWS staff believes that the Coates model is currently the “best available science” as it uses a more quantitative approach, but that the NDOW maps are also scientifically defensible. The SEC should be aware that in the Bi-State area, the Coates and NDOW maps turned out very similar and that this may also be the case State-wide. The SEC should also determine how they intend to use the Coates model if they do choose to pursue this for use in the State Plan. For example, would the results of the Coates model be used as NDOW Habitat Categories were used to develop management areas? If this is the case, the concerns on methods would still apply. Or, would a minimum occupancy potential be used to delineate management areas? In this example, justification would need to be provided on why the particular minimum was selected. USFWS staff also encouraged SETT to look into different

state-and-transition models, like The Nature Conservancy model, as a tool to prioritize use of Mitigation Credit funds for restoration efforts State-wide. These models would be complementary to the Coates model.

USFWS staff would also like clarification on the habitat classifications (occupied, suitable, and potential) used in the Plan, as these are different from the categories developed by NDOW. This is important as management strategies outlined in the Plan are determined by the habitat classification. The classifications currently are not defined clearly enough to be able to differentiate occupied from suitable habitat or potential from occupied. There is also concern that there is insufficient scientific information (telemetry data) to accurately define “occupied” habitat. This may lead to an underestimate of occupied habitat and an overestimate of suitable and potential habitat. Additionally, there are no management strategies provided for suitable habitat which leads to concern that these areas would not be managed.

Regulatory Mechanisms/ “Avoid, Minimize, Mitigate”

USFWS staff is not opposed to the State’s overarching management objective to “avoid, minimize, and mitigate” impacts to sage-grouse habitat, but that these terms need to be better defined in order to effectively identify when to move from one step to the next. A standard and consistent approach needs to be established to apply the “avoid, minimize, mitigate” concept across the landscape, suggesting that triggers or thresholds for each may help accomplish this. A transparent and consistent process, potentially detailed in a decision making tree, needs to be further developed for making decisions on proposed projects that may impact sage-grouse habitat. Specifically, the following concepts need to be more clearly defined and fleshed out:

- *Avoid* – Within the State Plan, are there thresholds or triggers identified that would lead a proposed action to be denied, i.e. is there ever a point in the Plan in which the State would “say no” to a proposed action? If there are no specified thresholds or triggers, is “avoid” achieved through a market-based approach via the Mitigation Crediting System, i.e. can this system provide a mechanism in which it may be too costly to “say yes” to a proposed action? If the market-based approach is applied as the “avoid” mechanism, then a method must be developed to evaluate the robustness of the model and allow for adaptive management of the approach, i.e. evaluate if the market-based approach is leading to avoidance of actions in critical sage-grouse habitat.
- *Minimize* – The Plan needs to include greater detail on best management practices (BMPs) and their application in order to ensure reduced impacts of unavoidable actions. The Plan needs to include specific BMPS and how and when these will be applied
- *Mitigate* – USFWS likes the concept of the Mitigation Crediting System, though more detail is needed. They understand that this is in development.

In addition, the Council directed staff to locate the specific citation in the Federal Register on the “avoid, minimize, mitigate” National Environmental Policy Act (NEPA) policy mentioned in the USFWS comments document. The NEPA of 1969, as amended (Pub. L. 91-190, 42 U.S.C. 4321-4347, January 1, 1970, as amended by Pub. L. 94-52, July 3, 1975, Pub. L. 94-83, August 9, 1975, and Pub. L. 97-258, § 4(b), Sept. 13, 1982), does not specifically discuss “avoid, minimize, mitigate”; however, the Council on Environmental Quality’s Regulations for Implementing the Procedural Provisions of NEPA (Reprint 40 CFR Parts 1500-1508) does provide guidance on this policy. It provides for the following provisions:

- “[an environmental impact statement] shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would *avoid* or *minimize* adverse impacts or enhance the quality of the human environment” (§1502.1);
- All alternatives, including the proposed action “shall include appropriate *mitigation* measures” (§1502.14(f)).

In their 2010 Findings, the USFWS determined that “existing regulatory mechanisms are inadequate to protect the species”. In the adequacy of regulatory mechanisms listing factor discussion, NEPA is mentioned several times in the “federal laws and regulations” subsection. Though a detailed discussion of NEPA was not included, in the meeting, USFWS staff further elaborated that since the policy does not adequately define when to “avoid”, when to “minimize”, and when to “mitigate”, there is a lack of consistency with its application across the landscape. USFWS staff is concerned that the similarly vague definitions in the State Plan may lead to the same lack of consistency in application.

*“No Net Loss”/ Cumulative Impacts to Habitat Due to “Acts of God”*

The USFWS staff is not opposed to the concept of “no net loss” as a general conservation goal; however, they seek further clarification on what is meant by the term. The concept needs to be defined spatially and temporally, and to specify no net loss of what -habitat or population? USFWS staff would also like the State to clarify how they will account for Acts of God in achieving no net loss. Since fire and invasive species are the primary threat to sage-grouse habitat, how will the Plan account for these in determining no net loss? If Acts of God are not to be included in the concept of no net loss, then an explanation is needed to explain how the plan works to ameliorate this threat.

The USFWS also needs clarification as it pertains to the 5% per 640 acre disturbance and 20% Potential Habitat disturbance policy. The 5% per 640 acre disturbance figure was derived from the Wyoming State Plan in relation to oil and gas development which may not be as applicable in Nevada and the 20% Potential Habitat figure is a misapplication of the Connelly et al 2000 report. In addition, allowing for these percentages of loss is inconsistent with a concept of no net loss - this needs to be

further clarified. SETT should reevaluate these thresholds and recommend to the SEC if they need to be adjusted and how they will be accounted for in the goal of no net loss.

### **CONCLUSIONS**

The 2012 Plan provides a good conceptual framework from which to build upon; however, details and definitions need to be fleshed out to provide for clear and consistent policies that will effectively result in the amelioration of threats to sage-grouse habitat and subsequent stabilization of the sage-grouse population in Nevada. Further development of the Plan will help provide an adequate regulatory mechanism to help preclude the listing of the sage-grouse in 2015 and selection of the Nevada State Alternative as the preferred alternative for the BLM EIS. While details on the adequacy of the recommended actions for specific threats were not discussed with the USFWS and NDOW, these actions as part of the Plan would benefit from a review of effectiveness and adequacy similar to the overall conceptual framework of the plan.

### **FISCAL IMPACT**

There is no fiscal impact at this time.

### **RECOMMENDATION**

Staff recommends that the Sagebrush Ecosystem Council authorize the Sagebrush Ecosystem Technical Team to:

- 1) Proceed with the development of the Coates Model and further work with the Sagebrush Ecosystem Council to determine how the mapping product will be utilized;
- 2) Further investigate the use and application of available state-and-transition models;
- 3) Further develop the Nevada State Plan and State BLM EIS Alternative in close coordination with the USFWS and other resource management agencies;
- 4) Begin the development of the Mitigation Crediting System and other regulatory mechanisms and policies as needed.

### **POSSIBLE MOTION**

Should the Board agree with the staff recommendation, a possible motion would be,

“Motion to authorize the Sagebrush Ecosystem Technical Team to:

- 1) Proceed with the development of the Coates Model and work with the Sagebrush Ecosystem Council to determine how the mapping product will be utilized;
- 2) Further investigate the use and application of available state-and-transition models;
- 3) Further develop the Nevada State Plan and State BLM EIS Alternative in close coordination with the USFWS and other resource management agencies;
- 4) Begin the development of the Mitigation Crediting System and other regulatory mechanisms and policies as needed.”

**Attachments:**

**1:** U.S. Fish and Wildlife Service Informal Draft Comments on Nevada Strategic Plan for Conservation of Greater Sage-Grouse – September 14, 2012

mf, ln:TR

**U.S. Fish and Wildlife Service Informal Draft Comments on Nevada Strategic  
Plan for Conservation of Greater Sage-Grouse  
September 14, 2012**

**General Comments**

- We encourage greater deference be afforded to the Nevada Department of Wildlife's (NDOW) Habitat Categorization Map. We consider this approach scientifically defensible and it affords great utility at understanding current bird distribution. Also, this product and its associated components help target areas of restoration.
- We request quantification on the amount of acreage identified through the NDOW mapping process (Categories 1-4) that was captured/excluded from the Nevada Plan mapping effort in order to better understand our baseline or starting place.
- It will be impossible for the Service to consider this Plan an adequate regulatory mechanism without identification of specifics with regard to the 'how' and 'when' an action is denied or altered (thresholds, triggers).
- The concept of No Net Loss needs additional clarification as it pertains to 5% per 640 acre disturbance discussion and 20% Potential Habitat disturbance discussion.
- The avoid, minimize, and mitigate approach is generally the structure adhered to on federal lands under the National Environmental Policy Act (NEPA). The Service determined in 2010 this was inadequate.
- Habitat loss due to Acts of God (Fire and Invasive species) will occur. This loss needs to be taken into consideration and adaptive management principles need to be built into the regulatory process to deal with these events.
- Funding and mechanism for implementation needs to be identified.

**Specific Comments**

**1.0 Introduction – p.1, 3<sup>rd</sup> paragraph**

The standard or rationale for developing the Nevada Plan was to address the Service determination of inadequate regulatory mechanisms in our 2010 12-month Finding.

**Mapping – p.2**

We would submit that the final mapping product appears generally reasonable but we would appreciate clarification. Specifically, we would be interested in a comparison with NDOW's Habitat Categorization Map to ascertain how much Habitat Category 1, 2, and 3 is captured within the SGMA and how much is excluded. Further, we consider the NDOW mapping effort to be a defensible product and consider deviation based on rationale other than sage-grouse ecology to be challenging in light of our 2010 Finding.

**2.0 Definitions – p.4**

- **Sage-grouse Management Areas** – *“Delineation of the SGMA does not imply any degree of regulatory control or impose land-use restrictions for land-use management decisions for these lands.”* This statement is contrary to the rationale for developing this plan (see Introduction) and certainly affords the Service no reason for changing our 2010 opinion on the inadequacy of regulatory mechanisms.
- **Occupied Habitat** – There needs to be clarification on the burden of proof, scale, and rationale associated with the phrase *“last five years”*. Important corridors connecting basins with ridge-tops are likely used briefly and as such will have limited documentable sign of use. On a number of occasions, the Service has engaged in conversations with stakeholders that dismiss bird occurrence in some specific locale, when ultimately more intensive study demonstrates occurrence.
- **Suitable Habitat** – Definition needs clarification. This seems to be the same as Occupied Habitat.
- **Potential Habitat** – Definition needs clarification. We believe the intent is to identify habitat that is not suitable but could be if logistically reasonable restoration action is undertaken (i.e., PJ thinning). However, as worded it appears some Potential Habitat could be Occupied Habitat.
- **Last paragraph** – Our comments on this statement links to mapping and rationale for utilizing 85% Core, as defined by Doherty (2010). Policies outlined in Nevada Plan are not applicable to sage-grouse and suitable habitat outside the SGMA’s. Our concern is that, if we start with 85% and this is further segregated in to various habitat classification (Occupied, Suitable, etc.), which presumably influences degree of concern by future Committee/Technical Team, the map extent appears to move in one direction – toward less. Further, there may be indirect or direct effect to populations within SGMA’s due to activity immediately outside SGMA’s, especially if these habitats are occupied by sage-grouse.

### 3.0 NV Conservation Goals and Strategies – p. 5

1. The plan appears to aspire to "no net loss" of sage grouse habitat from development - this is good. The sentence as written, however, is slightly confusing. We interpret it mean no net loss of sage-grouse/habitat but the use of “for” instead of “from” in front of the word “activities” could be interpreted to mean no net loss of activities. Thus, we would appreciate clarification of this statement.
2. The plan states that Nevada should be "held harmless" for habitat loss due to fire and invasive species. Assuming this, it is difficult to credit the State Plan with addressing the biggest threat to sage grouse - fire and invasive species - even though there are several pages of the plan dedicated to this topic. We agree that federal lands fire issues are difficult for the state to control, but we would encourage articulating a clear vision for addressing this threat that federal agencies could evaluate. Specifically, disturbance by fire should be considered when evaluating the appropriateness of additional disturbance created through authorized activities.

“Avoid, Minimize Mitigate” - p. 5.



This approach is current policy under NEPA and Service determined this was inadequate. There needs to be identified specific thresholds and or triggers for the determination and application of each of these.

3. **Avoid** – “*Where ever possible*” – This definition needs further refinement with associated thresholds or Service is challenged to alter from 2010 Finding determination.
4. **Minimize** – “*Furthest extent practical*” – This definition needs further refinement with associated thresholds or Service is challenged to alter from 2010 Finding determination. These are Best Management Practices that are typically applied today. Some may have utility (although there is uncertainty here), but there are generally not silver bullets to these complex problems.
5. **Mitigate** – “*After all appropriate and practicable*” – This definition needs further refinement with associated thresholds or Service is challenged to alter from 2010 Finding determination.

There are fundamental challenges to AMM approach.

- Nevada has a substantial stewardship responsibility for sage-grouse across the West.
- Loss habitat will occur due to factors outside of our control – Acts of God.
- Habitat restoration in the southern Great Basin is difficult.
- Reestablishment of sage-grouse, either actively or passively, into locations following extirpations is not easily accomplished.
- Measuring and accounting for the cumulative effect of this approach will be essential.
- If the AMM approach, without associated thresholds, is adopted, we will continue to reduce extant habitat and sage-grouse populations will be mitigated in a negative direction.

Three general conservation policies – p. 5.

1. “*Conserve greater sage-grouse ...consistent with economic vitality...*” – We request clarification of this statement. What will be the economic and conservation thresholds that determine vitality?
2. We request additional clarification of this statement. Namely, “*all means*” but additionally do you foresee instances where activities will be incompatible with sage-grouse conservation. Further, this ties back to mapping effort - While avoid, minimize, and mitigate will proceed within SGMA, will known sage-grouse habitats outside of SGMA receive this same “degree” of protection. If not, this will actually diminish the current standard on federally managed lands under NEPA, which the Service determined inadequate.
3. A broad coalition – This is great.

p. 5, last paragraph – We are unsure what is meant for sage grouse by, “best possible outcome,” here.

**3.1 Management Strategy in Occupied Habitat – p. 6**

Suitable Habitat should be included under this category.

1. P. 5 of Plan states a goal of “no net loss” and this bullet seems to contradict this goal. While the Service will temporarily defer our opinion on the adequacy of a 5% disturbance standard per 640 acres, we contend that simply triggering an evaluation is not adequate and needs additional clarification. We submit that if a specific percent standard were to be adopted, the regulatory process would need to be able to enforce this cap. To be clear, we anticipate all activities that would disturb sage grouse and their habitat (including from invasive species encroachment) would be included in this cap.
2. While we recognize that a significant amount of winter habitat has been impacted by wildfire, we are unclear as to why winter range alone was identified specifically? You could also include nesting habitat in this sentence as quality is influenced significantly by shrub cover and, additionally, you could add a bullet that restricts treatments in brood-rearing habitat to those that maintain or expand current extent or quality of mesic or meadow habitat available in the summer.
3. Great
4. Great

### **3.2 Management Strategy in Potential Habitat – p. 6**

1. Great
2. Not entirely clear on this bullet. As written, it states that habitat disturbance (from any number of human activities?) could occur in potential habitat but not exceed 20% per year per SGMA. If potential habitat represents those sites that are unoccupied but logistically feasible to bring back to suitable habitat – 20 percent seems excessively high as you are dismissing areas that can offer future “lift”. This implies that in 5 years, all potential habitats could be converted to non habitat (mine, wind, geothermal, etc.). On the other hand, it is not clear why we would limit the amount of restoration activities that could occur per year in potential habitat, unless potential habitat was actually occupied habitat. I believe you are misusing Connelly *et. al.* 2000. He is referring to occupied habitat and additionally his time frame is not annually but 2-3 decades, depending on habitat?
3. Great

### **3.3 Management Strategy in Non-Habitat – p. 6**

1. Need to remain cognizant of potential impacts caused by indirect effects of activities occurring outside of suitable habitat (such as noise or predator subsidy) and scale at which non-habitat is mapped. Also can these activities be encouraged to be sighted outside SGMA’s? This, of course, would further depend on the rationale underlying the adopted map.

### **3.4 Interim Strategy - p. 7**

Until such time the regulatory process (criteria, thresholds, triggers, etc) of this Plan are established, we submit that adoption of this Plan (#s 1, 5, 7) would undermine current BLM and

USFS direction and would run counter to the determination made by the Service in our 2010 Finding with respect to inadequate regulatory mechanisms. Further, we contend the “grandfathering” clause (#2) (as of July 31, 2012) runs counter to over a decade of efforts towards recognizing the need and working toward sage-grouse conservation. While it is reasonable that ongoing, non-expanding, projects should have no additional obligations, activities that have yet to receive a decision under NEPA should be evaluated.

#### **4.0 Implementation Responsibilities**

We are unclear what impacts of listing the sage grouse would include that are “well documented,” – please document – or what, “significant negative impacts” would occur. We understand the perceptions here, and if we specifically can say what it is we’d like to avoid, we may be more successful in doing so in the event sage grouse are listed. Also, we believe that if this state plan is to be effective, then the effects of a decision to list sage grouse should not be much different than the effects of this plan.

#### **4.1 Sage-grouse Advisory Council – p. 8**

The individual topics addressed in this section are each important. The Service offers comments on selected topics, identified by bulleted number contained within the Plan. We have no comments on the topics not identified.

3. This topic is incredibly important and will establish the ground work from which the Service can assess the regulatory adequacy of this Plan.
5. Again, funding is a critical topic, which will facilitate the Service in forecasting potential for conservation.
10. We submit that the Council’s activities should be adaptive. Thus, some degree or form of latitude should be granted.

#### **5.0 Sage-Grouse Management Area Map Recommendations – p. 11**

- We would submit the best available science initiated the mapping efforts but after refinements based on an unclarified rationale, the SGMA Map was derived. While we appreciate the Committee’s effort toward mapping, we would encourage the adoption of the NDOW’s Habitat Categorization map and then pursuing refinements as new data are collected.
- Can the SGMAs be altered to include additional habitat or do these areas only get smaller?
- #5 – We are not clear as to what “exempt from additional regulations” implies?
- Last Paragraph – I am not sure what is implied by this statement. How will areas of known development be considered going forward. If these activities are to be “grandfathered in”, the area should not be excluded from the map and this existing disturbance should be considered when evaluating new developments.

#### **6.0 Threat Assessment and Recommended Actions**

Our comments on individual threats contained in this section are generally captured under the Avoid, Minimize, and Mitigate section above. As worded, several sections lead us to believe the

adopted standard for burden of proof is 'demonstrate harm' and not 'demonstrate no harm.' This may be important in the perception or reality of perpetuating 'business as usual.' We anticipate thresholds, standards and actions would need to be identified and established.

## 7.0 De Minimis Activities

In general, the Service considers ranching operations and many ranching practices, when conducted in a sustainable manner, to generally be not incompatible with sage-grouse conservation. However, we encourage the review of individual practices and adoption of alternative approaches when they afford a positive influence on the species. There may be straightforward, practical, proven ideas that have not caught on within the agricultural and ranching communities.

We are recently becoming aware of concerns over a potential relationship between livestock grazing and the spread of invasive species such as cheatgrass. If such a relationship exists, then we would perceive livestock grazing to be of significantly greater concern to sagebrush ecosystem conservation. We encourage further exploration of this topic.

1. Timing of husbandry practices should be taken into consideration. We have witnessed sheep bands bedded down on leks sites during the leking season.
2. We are not sure what all is covered under "existing farming practices" but there may be practices that could be altered to afford a little more deference for the species without being overly burdensome on the producer. For example, cutting alfalfa or other pasture grass, starting from the inside of the field and working out, outfitting equipment with "flushing bars" when feasible, or altering livestock access to riparian areas in order to maintain stream and associated meadow integrity.
3. We assume all allotments have an associated Federal management plan. Thus, we infer from this bullet that all operations with allotments would be immune from any regulation adopted through this Plan. We contend that while an allotment plan may be appropriate, meaning it represents a sustainable prescription, implementation is a separate issue and one that requires follow-through. Some allotments remain degraded regardless of prescription or language contained in the management plan. Thus, we do not consider all operations that have existing management plans to be a de minimus activity but only those that actively and effectively implement prescriptive grazing plans, which are compatible with sage-grouse habitat requirements.
4. We would encourage as little infrastructure development as possible within four miles of a lek regardless of construction timing. Most hens nest in proximity to lek sites (this is what informs Doherty's model). Concentrating cattle through tank development or installing windmill structures, which are often used as nesting substrates by ravens within this four mile lek buffer would not be ideal.
5. We would strongly encourage limiting new aboveground transmission lines within four miles of lek sites.
6. No comment
7. We would discourage new fences within 1.25 miles of a lek or other sites where seasonal congregations of sage-grouse occur. Also, we would encourage exploring other fencing

options such as electric or let down in lieu of traditional, three or four strand wire designs.

8. No comment
9. Mesic sites are incredible important to sage-grouse in Nevada. When considering how much is “enough water”, we would encourage deference be afforded to sage-grouse.
10. We are not familiar with the RAAT protocol. Grasshopper’s do, however, represent an important dietary item for developing chicks. Thus, we would encourage limiting herbicide application intended to reduce insect numbers.
11. No comment
12. No comment
13. No comment