

V. CAUSAL FACTOR ANALYSIS AND MANAGEMENT RECOMMENDATIONS

The Local AMRTs are tasked with completing a causal factor analysis and provide management recommendations associated with each population or habitat trigger. The results from this process are provided below in a *Causal Factor* table for each Conservation Planning Area.

5.5 SOUTH CENTRAL CONSERVATION PLANNING AREA (POINT OF CONTACT – JAKE TIBBITTS)

	AMRT Management Recommendations <i>Please list appropriate, realistic, and targeted responses for each causal factor. Please limit/prioritize to a maximum of 5 actions per/PMU. Actions need not be restricted to federal agencies (i.e., BLM/Forest Service), they may involve other governmental organizations (e.g., NDOW, County, State, etc.). Please identify which agencies the recommendations are meant for.</i>	Agency Response <i>Please provide a brief, detailed explanation that responds to the request. If the request cannot be addressed, please detail the reason and how future requests may be more meaningful.</i>
Category	<p style="text-align: center;"><u>Tuscarora PMU Habitat Trigger:</u> Causal factor: Wildfire</p> <p style="text-align: center;"><u>Tuscarora PMU Population Trigger:</u> 1 (partial) soft cluster/PMU</p> <p style="text-align: center;">Possible causal factor(s): Wildfire impacts as well as cumulative effects of other disturbance.</p>	
Invasive Weeds		
Fuels Management	<p>Need proactive work in this area to minimize fire sizes and protect intact habitat and unburned islands within fire perimeters.</p> <p>Specifically target fuel breaks to protect investments (e.g., ESR) and rehab that have occurred. Have history of where fires consistently start. Maintain existing fuel breaks. Expand potential for targeted grazing.</p>	<p>USFS Response: The Humboldt-Toiyabe National Forest has forest plan direction regarding retaining unburned islands of sagebrush and other sage grouse habitat areas in the 2015 Greater Sage Grouse Plan Amendment:</p> <p>GRSG-FM-DC-048-Desired Condition – In priority and general habitat management areas and sagebrush focal areas, protect sagebrush sage grouse habitat from loss due to unwanted wildfires or damages resulting from management related activities while using agency risk management protocols to manage for fire fighter and public safety and other high</p>

priority values. In all fire response, first priority is the management of risk to firefighters and the public. Sage grouse habitat will be prioritized as a high value resource along with other high value resources and assets.

GRSG-FM-GL-056-Guideline – In priority and general habitat management areas and sagebrush focal areas, use fire management tactics and strategies that seek to minimize loss of existing sagebrush habitat. The safest and most practical means to do so will be determined by fireline leadership and incident commanders.

GRSG-FM-GL-066-Guideline – In priority and general habitat management areas and sagebrush focal areas, to minimize sagebrush habitat loss, consider using the full range of suppression techniques to protect unburned islands, doglegs, and other sage grouse habitat features that may exist within the perimeter of wildfires. These suppression objectives and activities should be prioritized against other wildland fire suppression activities and priorities.

The first priority of the Forest Service in any fire response is firefighter and public safety. The incident commander will evaluate fire behavior and available resources when determining appropriate suppression tactics. If retaining an unburned island of sagebrush or other sage grouse habitat features could result in firefighters being trapped, working under higher risk conditions or creating conditions that could lead to re-burn, other suppression tactics such as burnouts may be used.

USFS Response: Forest Service vegetation management projects emphasize strategic placement of landscape level treatments that protect communities and habitat for multiple species, and include other restoration activities to meet multiple objectives. Smaller scale fuel breaks such as roadside treatments included in landscape level treatments are also used to provide for safe and effective fire suppression strategies.

USFS Response: In 2019, the Forest Service entered into an agreement with the University of Nevada, Reno to facilitate expansion of the use of

targeted grazing across the HTNF. As part of this agreement, the Forest Service plans to expand use of targeted grazing into the South Sugarloaf burned area in an effort to reduce invasive annuals and will use targeted grazing of invasive annuals at multiple sites on the Carson Ranger District as part of the fuels reduction treatments. The HTNF is currently preparing an Environmental Assessment for invasive plant treatments on all HTNF lands in Nevada. This EA includes the use of targeted grazing treatments on invasive plant species. With information gained from the agreement with UNR, the invasive plant treatment EA and existing categorical exclusions, the HTNF should be well positioned to expand targeted grazing treatments.

BLM-NV Response:

Consider submitting a proposal for this project (identify types of proactive work that could be done) as part of this process next year. Provide location(s) (map) where proactive work is needed, a description of the proposed project, possible partners (NDF?).

Identify the fuel breaks that need to be maintained or expanded (locations on a map, miles of maintenance needed, etc.)

It is possible that the NEPA could be covered by use of this new CX: by June 1, 2020, a categorical exclusion (CX) for the BLM as directed by the amendment of the [Healthy Forests Restoration Act \(HFRA\) of 2003](#) by the Agriculture Improvement Act of 2018 for covered vegetation management activities carried out to protect, restore, or improve habitat for greater sage-grouse or mule deer will be available for use by the field offices. The CX includes manual, mechanical, chemical, some fire, and targeted grazing techniques up to 4,500 acres. The *Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin* ([DOI-BLM-ID-0000-2017-0003-EIS](#)) will be available for use before September 2020 and , the

		<p><i>Programmatic EIS for Fuel Breaks in the Great Basin</i> (DOI-BLM-ID-0000-2017-0001-EIS) is already available for use.</p> <p>The Winnemucca District will use the Targeted Grazing EA (DOI-BLM-NV-0000-2019-0003-EA), which will be completed before the end of FY2020, in applicable situations. There has been limited fuels reduction using livestock and prescriptive grazing in conjunction with Emergency stabilization and rehabilitation activities from the districtwide EA.</p> <p>There is already a standing best management practice and policy to retain or save sagebrush islands to the extent practicable and it is our practice to conserve sage brush islands after perimeter control is obtained. It is not prudent, however, to dictate areas where a backfire or burn out operation may or may not occur. These are tactical decisions made on the ground and in consult with agency administrators depending on the size and scope of the operation and risk analysis. Putting arbitrary constraints on tactics may have the unintended consequence of fires becoming larger when proper tactics cannot be used.</p> <p>There is no policy to enforce that states backfires may not be used. Backfires (common terminology) are a tactic, often employed in conjunction with existing strategic fuelbreaks. Once the fire or a portion of the fire has been contained, then the policy or direction dictates that any existing stands of native vegetation or sagebrush will be fully suppressed if it can safely be done to retain the existing seed source. Please define policy mentioned or clarify meaning.</p>
Wildfire Response	Strive for 100% fire suppression. Pre-position of suppression resources/equipment. Initial attack is key. Get the Rancher Liaison Program up and running. Prioritize retain unburned islands of sagebrush whenever possible – bias against back burns unless absolutely necessary.	<p>USFS Response: The Humboldt-Toiyabe National Forest has forest plan direction regarding wildfire suppression in the 2015 Greater Sage Grouse Plan Amendment.</p> <p>GRSG-FM-DC-048-Desired Condition – In priority and general habitat management areas and sagebrush focal areas, protect sagebrush sage grouse habitat from loss due to unwanted wildfires or damages resulting</p>

	<p>Even in burn areas, prioritize resources protect high value areas such as riparian zones, springs, and pockets of sagebrush.</p>	<p>from management related activities while using agency risk management protocols to manage for fire fighter and public safety and other high priority values. In all fire response, first priority is the management of risk to firefighters and the public. Sage grouse habitat will be prioritized as a high value resource along with other high value resources and assets.</p> <p>The Forest Service contains 97% of wildfires during initial attack and full suppression is generally the objective in sage grouse habitat. However, firefighter and public safety is the agency's number one priority, and the incident commander and line officer maintain the flexibility to identify appropriate objectives, strategies and tactics for each wildfire.</p> <p>USFS Response: The Humboldt-Toiyabe National Forest has forest plan direction regarding repositioning suppression resources in the 2015 Greater Sage Grouse Plan Amendment:</p> <p>GRSG-FM-GL-063-Guideline On critical fire weather days, protection of greater sage-grouse habitat should receive high consideration, along with other high values, for positioning of resources.</p> <p>GRSG-FM-GL-064-Guideline – Line officers should be involved in setting pre-season wildfire response priorities and, prioritizing protection of priority and general habitat management areas and sagebrush focal areas, along with other high values. During periods of multiple fires or limited resource availability fire management organizational structure (local, regional, national) will prioritize fires and allocation of resources in which sage grouse habitat is a consideration along with other high values.</p> <p>During wildfire season, the Forest Service coordinates regularly with the other fire agencies to monitor conditions and reposition resources to protect sage grouse habitat and other high resource values. Local cooperators talk on a weekly or daily basis when conditions warrant and share information with fire management staff at the state and local level</p>
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		<p>to assist in identifying where additional initial attack resources may be needed.</p> <p>Data used in determining whether conditions warrant repositioning resources include the fuel moisture database, energy release components obtained from local Remote Area Weather Stations, the National Interagency Fire Center’s predictive services outlook for the Great Basin (7-day and monthly), the U.S. Drought Monitor for Nevada, and information about events that could result in wildfire starts, such as Fourth of July celebrations, large public gatherings or a critical fire weather event (lightning, wind event, high Haines index). Regional and national preparedness levels affect the availability of resources for repositioning.</p> <p>Sage grouse habitat maps are loaded into the Computer Automated Dispatch system, allowing interagency dispatch to determine when a fire start may potentially threaten sage grouse habitat. Initial attack crews verify this information when they arrive on site, and employ appropriate suppression tactics.</p> <p>USFS Response: The Humboldt-Toiyabe National Forest began to institute the Rancher Liaison Program forest-wide toward the end of the 2019 wildfire season and looks forward to working with ranchers to expand and improve these efforts.</p> <p>USFS Response: The Humboldt-Toiyabe National Forest has forest plan direction regarding retaining unburned islands of sagebrush and other sage grouse habitat areas in the 2015 Greater Sage Grouse Plan Amendment:</p> <p>GRSG-FM-DC-048-Desired Condition – In priority and general habitat management areas and sagebrush focal areas, protect sagebrush sage grouse habitat from loss due to unwanted wildfires or damages resulting from management related activities while using agency risk management protocols to manage for fire fighter and public safety and other high</p>
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GRSG-FM-GL-066-Guideline – In priority and general habitat management areas and sagebrush focal areas, to minimize sagebrush habitat loss, consider using the full range of suppression techniques to protect unburned islands, doglegs, and other sage grouse habitat features that may exist within the perimeter of wildfires. These suppression objectives and activities should be prioritized against other wildland fire suppression activities and priorities.

The first priority of the Forest Service in any fire response is firefighter and public safety. The incident commander will evaluate fire behavior and available resources when determining appropriate suppression tactics. If retaining an unburned island of sagebrush or other sage grouse habitat features could result in firefighters being trapped, working under higher risk conditions or creating conditions that could lead to re-burn, other suppression tactics such as burnouts may be used.

BLM-NV Response:

To the extent possible BLM does pre-position suppression resources/equipment.

The Rancher Liaison Program is something that may need to be discussed with upper management. Inquire why it is not being used any more. If it is due to funding, consider submitting a proposal for funding through this next year.

		<p>There is already a standing best management practice and policy to retain or save sagebrush islands to the extent practicable and it is our practice to conserve sage brush islands after perimeter control is obtained.</p> <p>The BLM does prioritize resources to protect high value areas, if possible, through the use of resource advisors.</p>
Vegetation Management	<p>Ensure use of Ecological Site Descriptions and their associated State and Transition Models/Disturbance Response Groups in developing and implementing rehab/restoration – focus on what is ecologically attainable, be realistic.</p>	<p>USFS Response: The Forest Service uses best available science to identify site specific treatment areas and types. This includes Forest Service general technical reports, the resistance and resilience matrix, ecological site descriptions (ESDs), and state and transition models. ESDs are essential resources to the Humboldt-Toiyabe National Forest Invasive Plants program. Where an ESD overlaps a treatment area, it is referenced for soil types to improve herbicide choices for the most effective treatment options. ESDs are also used for rehabilitation purposes to help with native vegetation reseeding efforts.</p> <p>BLM-NV Response:</p> <p>To the extent possible, BLM does this.</p>
Misc	<p>Good work is taking place in this area on BLM and private land and State land. Need to ensure continued funding and capacity to keep moving these current efforts forward to success – examples of work currently underway includes fuel breaks (primarily chemical treatments on cheatgrass), BLM sagebrush plantings, and other reseeding efforts.</p> <p>Get a list of projects already underway from the various agencies and entities so that efforts can be synergized.</p> <p>Develop map of connectivity between habitat and projects– connect what is already going on to then fill the gaps.</p>	<p>USFS Response: Various initiatives are underway in Nevada to better track past, current and planned work to reduce wildfire risk and improve habitat. In November 2019, the Forest Service, BLM and the U.S. Fish and Wildlife Service signed the Nevada Shared Stewardship Agreement with the Nevada Governor’s Office. The agreement initially focuses on reducing wildfire risk. A first step in meeting the commitments in the Shared Stewardship agreement involves federal and state agencies assembling a database with layers that include values at risk (including important habitat for sage grouse and other species), as well as past, current and out-year projects and the results of past prioritization efforts, among others. This database will help agencies focus on working across jurisdictions to increase efficiency, understand which projects will offer the best return on investment, and reach out to other partners to complete</p>

		<p>projects that will decrease wildfire risk. The database will be accessible to partners such as local area working groups.</p> <p><u>BLM-NV Response:</u></p> <p>Consider submitting proposals for the types of projects identified here (locations, acreages/miles, possible partners for implementation, etc.)</p> <p>This is something that could occur at the meetings to prepare this report. It is an excellent idea.</p>
<p style="text-align: center;"><i><u>Three Bar PMU Population Trigger:</u></i></p> <p style="text-align: center;">1 soft cluster/PMU</p> <p style="text-align: center;">Possible causal factor(s):</p> <p>For 3-Bar portion, travel on county road impacts to leks near or on roads- including Rye Patch Canyon and Fye Canyon. Traffic impacts may be related to increased traffic going to Cortez PMU area.</p> <p style="text-align: center;">Portions of lower elevations in Trail Canyon Fire are cheatgrass and other invasives.</p> <p style="text-align: center;">Feral Horse populations from Rocky Hills HMA in and out of HMA.</p> <p style="text-align: center;">PJ encroachment in upper elevations.</p> <p>Recognize a habitat warning from Gold Bar Mine. The possible causal factor is committed and required sage grouse mitigation has not been implemented. Also, mine traffic may be impairing leks near and even on roads – Roberts Creek, Henderson, and 3-Bars.</p>		
Vegetation Management	<p>Mow out from the road adjacent to leks to give birds room to move off the roads for breeding. Use Fuel Break NEPA or CX. Try to put in before 2020 breeding season.</p> <p>PJ encroachment and expansion into sage grouse habitat must be addressed. There are many avenues to help address this including the 3-Bars Project EIS, BEA EA and Great Basin Programmatic EIS for rangeland restoration.</p>	<p><u>USFS Response:</u></p> <p>No USFS Response Needed: No NFS lands in PMU</p> <p><u>BLM-NV Response:</u></p> <p>This has been added to the list of projects for the Fuels Team it implement/maintain.</p>

		<p>It is possible that the NEPA could be covered by use of this new CX: by June 1, 2020, a categorical exclusion (CX) for the BLM as directed by the amendment of the Healthy Forests Restoration Act (HFRA) of 2003 by the Agriculture Improvement Act of 2018 for covered vegetation management activities carried out to protect, restore, or improve habitat for greater sage-grouse or mule deer will be available for use by the field offices. The CX includes manual, mechanical, chemical, some fire, and targeted grazing techniques up to 4,500 acres. The <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (DOI-BLM-ID-0000-2017-0003-EIS) will be available for use before September 2020 and the <i>Programmatic EIS for Fuel Breaks in the Great Basin</i> (DOI-BLM-ID-0000-2017-0001-EIS) is already available for use.</p> <p>Identify the location(s) where PJ is encroaching/expanding into GRSG habitat. Submit the map(s) along with a project proposal. Identify possible partners to implement the project. This type of site specific information is needed in order to submit a project proposal in BPSS or NFPORS.</p>
Wildlife Management	To try to get birds back on leks that have been inactive for 19 years, focus on habitat work. 3-Bars EIS and Barrick (now Nevada Gold Mines) Bank Enabling Agreement (BEA) EA allows many options here.	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p><u>BLM-NV Response:</u></p> <p>Identify the type(s) of habitat work needed, location(s), acreages, and possible partners for project implementation. This type of project could be submitted in BPSS or NFPORS next year.</p>
Misc	<p>Get and maintain Rocky Hills at AML and horses in the HMA. This is understanding there are other higher gather priorities.</p> <p>BLM needs to hold Gold Bar Mine to their legal requirement for mitigation – proponent driven or CCS. Ask proponent to use CCS. Use existing CX authority if</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p><u>BLM-NV Response:</u></p>

	<p>available. This may be another mitigation project tied to the 3-Bars EIS, potentially, that has not had a ROD signed yet. Connect mine with nearby landowners for potential CCS project (such as 3-Bars Ranch or Roberts Creek Ranch). BLM</p> <p>3- Bars Project ROD needs to be signed to allow for some mitigation measures to take place. But 3-Bars was not specific to sage grouse and there could be better mitigation if it were solely sage grouse focused.</p> <p>BLM must ensure Gold Bar Mine and all their employees, contractors, deliveries use the roads and times mandated in the ROD. Not just letters from mine to contractors, etc. Education component to these folks on why this is important should be implemented. BLM</p> <p>Significant progress needs to be made by Gold Bar Mine on implementing mitigation. The Team had much discussion and debate on moving this to a trigger based on available information and recent lek counts but chose to stay at a warning instead to give the Mine an opportunity to meet their commitments.</p>	<p>The BLM could prioritize HAF assessments and sage-grouse habitat inventory in HMAs that are within triggered areas to help support gather priorities. However gathers are scheduled at a national level.</p> <p>The 3-Bars ROD has been signed.</p> <p>Consider submitting a proposal to create an educational brochure, webinar, or presentation, etc. for this purpose to provide the mine employees, contractors, etc. Traffic on these roads is not only mining related. Coordination with Eureka County, NDOW, and other land users would be needed to get the word out on how important it is to avoid these roads during lekking season.</p>
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Shoshone PMU Population Trigger:

1 soft cluster/PMU

1 hard lek (Cooks Creek 2)

Possible causal factor(s):

Nothing really acute determined as a causal factor. Likely a combination of cumulative impacts including:

- General anthropogenic disturbance
- Predation, mostly by ravens
- Fire and fire rehab not fully implemented to success
- Horses causing wet meadow degradation

- PJ encroachment
- Excess BLM managed horses
- Fires starts from vehicles on Interstate have caused many fires along freeway

Cooks Creek 2 and surrounding likely due to Elephant Fire (2006). Minimal rehab efforts were implemented.

Argenta specific – smaller mines, many fires in this area. Not high-quality habitat. Fire Creek itself.

Some of Shoshone is in BEA – east edge. Here, these factors can be better determined through drilling down with NGM on what has been done through their modeling and mitigation development through BEA.

10-year permit renewal for Argenta Allotment may address some of these issues as well – some Range Improvement Projects proposed to address some issues. Rotational grazing included to allow for more rest.

Duplication of effort on counting leks may have detrimental effects on leks. Many contractors, multiple interests, much overlap. The birds are being potentially flushed from leks due to so much data being collected by various entities.

<p>Invasive Weeds</p>	<p>Support and expand weed treatments on Indian Creek, Ferris Creek (whitetop). Baker Hughes mine at Argenta point and Slaven Haul Road – work with Baker Hughes to address thistle. Work through LCCD and Humboldt CWMA.</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>BLM-NV Response: Habitat Restoration Projects for Indian Creek and Ferris Creek could be funded through BPSS. Consider submitting a project proposal next year through this AMRT process. Identify the location(s), types of treatment, acres/miles of treatment, and possible implementation partners. Coordination between the Weeds/ESR Team and Wildlife Team is needed to see if this is a project area that the BLM would like to prioritize. Another idea is to look at each PMU Trigger Area and come up with a weed treatment plan that targets the highest priority areas for sage-grouse habitat (work with the area specific NDOW people to get an idea of targeted areas). We can combine the treatment plan with a follow-up of seedings and other treatments, if needed. Having a plan and specific targeted treatment sites planned out in advance can be beneficial when asking for large amounts of funding. The Weeds/ESR Team might be</p>
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		<p>coordinating with NDOW and doing this already. Also, look into what NEPA options are available now and what will be needed on priority treatments.</p> <p>It is possible that the NEPA could be covered by use of this new CX: by June 1, 2020, a categorical exclusion (CX) for the BLM as directed by the amendment of the Healthy Forests Restoration Act (HFRA) of 2003 by the Agriculture Improvement Act of 2018 for covered vegetation management activities carried out to protect, restore, or improve habitat for greater sage-grouse or mule deer will be available for use by the field offices. The CX includes manual, mechanical, chemical, some fire, and targeted grazing techniques up to 4,500 acres. The <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (DOI-BLM-ID-0000-2017-0003-EIS) will be available for use before September 2020.</p>
Fuels Management	<p>ESR efforts; follow up for success on these plans.</p> <p>Fire in Crum Canyon on private land – install green strip along county road and seeding on private lands.</p> <p>Implement fuel breaks along I-80 and the railway to protect against repeated fire starts – co-efforts between NDOT, Union Pacific, BLM, private landowners. BLM, Union Pacific, NDOT</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>NDOT Response: Generally, highways serve as effective fuel breaks, however any fuels management on NDOT ROW must consider Department’s air quality and stormwater requirements and incorporate reviews for other resource impacts.</p> <p>BLM-NV Response: The <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (DOI-BLM-ID-0000-2017-0003-EIS) will be available for use before September 2020 and the <i>Programmatic EIS for Fuel Breaks in the Great Basin</i> (DOI-BLM-ID-0000-2017-0001-EIS) is already available for use.</p> <p>Could NRCS help with ESR on private land?</p> <p>Identify the areas needed for fuel breaks on a map, along with miles/acres needing treatment, and possible partners for</p>

		implementation/maintenance. Submit this project proposal next year as part of this AMRT process.
Vegetation Management	<p>Support efforts on Fire Creek for meadow protection and enhancement.</p> <p>Fire rehab follow through – revisit Elephant Head ESR to ensure success. Potentially develop new NEPA. Herbicides approved for use are not yet on BLM Pesticide Use Proposal (PUP) (e.g. Milestone and OpenRange G) need to be available for use on public land.</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>BLM-NV Response: Consider submitting a project proposal for meadow protection and enhancement next year as part of this AMRT process. Include information on location(s), acreage, types of needed to implement the protection/enhancement.</p> <p>The <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (DOI-BLM-ID-0000-2017-0003-EIS) will be available for use before September 2020. This PEIS may be able to be used to help ensure ESR success.</p>
Range Management	<p>Meadows at The Park – work on restoration and grazing plan of this area.</p> <p>Support 10-year grazing permit from BLM State Permit Renewal Team for Argenta to implement livestock management and range improvements.</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>BLM-NV Response: The <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (DOI-BLM-ID-0000-2017-0003-EIS) will be available for use before September 2020.</p> <p>Consider submitting a proposal for the restoration work (types of work, locations, acreages, etc.) as part of the AMRT process next year.</p> <p>The Grazing Permit Renewal Team is addressing public comments received on the preliminary Argenta grazing permit renewal EA (DOI-BLM-NV-B000-2018-0006-EA).</p>
Wildlife Management	Survey of leks – many crews with multiple mines doing lek counts during same timeframes. Need to better	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p>

	<p>coordinate counts to cut down on potential impacts to leks. Data sharing, coordination, data collection protocol (3 separate times counting is sufficient in a season?).</p> <p>Develop and direct strategic focus of raven control around leks and critical habitats through a holistic view by pairing with habitat work (through BEA), fire rehab, or other entity efforts. Synergize corvid control with habitat enhancement.</p> <p>Stay on top of and expand efforts to limit raven subsidies at Battle Mountain dump.</p>	<p><u>BLM-NV Response:</u> The Battle Mountain District has been working with NDOW, Proponents, and contractors to address multiple survey counts. Several Proponents have put in place data sharing agreements and have coordinated their survey efforts with each other and NDOW. Coordination and communications at baseline meetings and meetings with contractors about coordinating counts seems to cut down on this threat.</p> <p>Coordination with the BLM fuels team, BEA and NDOW to target NEPA ready critical habitat areas that can be seeded or planted with sagebrush seedlings to help provide cover on a landscape type of level. NFPOs or BPSS funding could be used.</p> <p>N/A to BLM. BLM manages wildlife habitat, not wildlife. Battle Mountain dump managed by Lander County</p>
Misc	<p>Portion covered by BEA – the actions under the BEA EA are designed to directly address many of the causal factors, all habitat related, fire rehab, annual grass, PJ, wet meadow. Support implementation of the BEA ASAP.</p> <p>Get and maintain wild horses at AML in the HMA. This is understanding there are other higher gather priorities.</p>	<p><u>USFS Response:</u> No USFS Response Needed: No NFS lands in PMU</p> <p><u>BLM-NV Responses:</u> Prioritize HAF assessments and sage-grouse habitat inventory in HMAs that are within triggered areas to help support Gather priorities. Consider submitting a proposal next year as part of this process for field crews to do the HAF assessments and GRSG habitat inventories in HMAs.</p> <p>The BLM is committed to working with Congress, state and local governments, partner organizations, and the public to find commonsense solutions for putting the wild horse and burro program back on a sustainable and fiscally responsible track.</p> <p>The BLM could prioritize HAF assessments and sage-grouse habitat inventory in HMAs that are within triggered areas to help support gather</p>

priorities. However, gathers are scheduled at a national level, not at a State Office or District Office level.

Cortez PMU Population Trigger:

1 soft cluster/PMU

1 soft lek (Modarelli Mine 2)

Possible causal factor(s):

Likely a combination of cumulative impacts including:

- General anthropogenic disturbance
- Predation, mostly by ravens
- Fire and fire rehab not fully implemented to success
- Horses causing wet meadow degradation. Horses are domestic estray and under state estray laws, not federally protected.
- PJ encroachment
- Noxious weeds.

These factors can be better determined through drilling down with NGM on getting to these issues through their modeling and mitigation development through BEA.

Duplication of effort on counting leks may have detrimental effects on leks. Many contractors, multiple interests, much overlap. The birds are being potentially flushed from leks due to so much data being collected by various entities.

NGM exploration pad on lek at Horse Creek 2 lek.

Horse Creek 1 lek – NGM laydown yard, noise and traffic <1 mile.

Modarelli Mine 1 lek – uncertainties of lek. 2-track road and fence there. Nothing that obvious. Near the Boo Hoo fire if not within this fire perimeter.

Vegetation Management

ESR efforts; follow up for success on these plans.

Reclaim exploration pad conducive to sage grouse needs and road into pad.

USFS Response:

No USFS Response Needed: No NFS lands in PMU

BLM-NV Responses:

If additional efforts are needed to assist with the ESR, it is possible that use of the CX could be used for additional work in the area. It is possible that the NEPA could be covered by use of this new CX: by June 1, 2020, a

		<p>categorical exclusion (CX) for the BLM as directed by the amendment of the Healthy Forests Restoration Act (HFRA) of 2003 by the Agriculture Improvement Act of 2018 for covered vegetation management activities carried out to protect, restore, or improve habitat for greater sage-grouse or mule deer will be available for use by the field offices. The CX includes manual, mechanical, chemical, some fire, and targeted grazing techniques up to 4,500 acres.</p> <p>If additional work is needed to assist with the ESR success, consider submitting a project to help with the ESR success.</p> <p>Check with Minerals Team about the reclamation required for this site. If additional reclamation is needed work with NGM to come up with a solution.</p>
<p>Wildlife Management</p>	<p>Survey of leks – many crews with multiple mines doing lek counts during same timeframes. Need to better coordinate counts to cut down on potential impacts to leks. Data sharing, coordination, data collection protocol (3 separate times counting is sufficient in a season?).</p> <p>Gather more data on what is happening with GSG at Modarelli lek– lek counts, collaring, etc.</p> <p>Flight diverters on fence at Modarelli lek.</p> <p>Direct strategic focus of raven control around leks and critical habitats through NDOW Project 21. Develop other strategic corvid projects through a holistic view by pairing with habitat work (through BEA), fire rehab, or other entity efforts. Synergize corvid control with habitat enhancement.</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>BLM-NV Response: The Battle Mountain District has been working with NDOW, Proponents, and contractors to address multiple survey counts. Several Proponents have put in place data sharing agreements and have coordinated their survey efforts with each other and NDOW. Coordination and communication at baseline meetings and meetings with contractors about coordinating counts seems to cut down on this threat.</p> <p>NGM was going to add markers to this fence. However, it that is not going to happen, consider submitting a project proposal for this next year through the AMRT. Identify the project location on a map and the miles of fence needing flight diverters.</p>

		N/A to BLM. BLM manages wildlife habitat, not wildlife.
Misc	<p>BEA – the actions under the BEA EA are designed to directly address many of the causal factors, all habitat related, fire rehab, annual grass, PJ, wet meadow. Support implementation of the BEA ASAP.</p> <p>Gather and remove stray horses – ask family that owns them to partner.</p> <p>Nothing specific on laydown yard at this point. BEA is intended to offset these impacts.</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>BLM-NV Response:</p> <p>Coordination with the BLM fuels team, BEA and NDOW to target NEPA ready critical habitat areas that can be seeded or planted with sagebrush seedlings to help provide cover on a landscape type of level. Consider submitting project proposal(s) for this next year through the AMRT. Identify the type of project, location(s), acres, possible partners.</p> <p>Eureka County said they would talk to the horse owners about this situation. However, stray (and feral) horses are not managed by the BLM.</p>
<p><u>Cortez PMU Population Trigger:</u> 1 hard lek (Pony Express 2) Possible causal factor(s):</p> <p>Lek is 100 to 150 yds from road. Birds flush to Mulligan Gap and Tyrone Gap – lots of PJ encroachment coming down slope from this area. Birds strutting has shifted down towards road due to PJ. General road traffic. Predation</p>		
Vegetation Management	<p>PJ treatment must be a priority. PJ has forced birds down to road that has now caused detrimental impacts. Determine if Sulphur Springs Hazardous Fuels EA would cover removing some of these trees. The 3-Bars Project could provide PJ opportunities in this area when approved. 3- Bars Project ROD needs to be signed.</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>BLM-NV Response:</p> <p>The NEPA could be covered by use of this new CX: by June 1, 2020, a categorical exclusion (CX) for the BLM as directed by the amendment of the Healthy Forests Restoration Act (HFRA) of 2003 by the Agriculture Improvement Act of 2018 for covered vegetation management activities carried out to protect, restore, or improve habitat for greater sage-grouse</p>

		<p>or mule deer will be available for use by the field offices. The CX includes manual, mechanical, chemical, some fire, and targeted grazing techniques up to 4,500 acres. Or the NEPA could be covered by the <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (DOI-BLM-ID-0000-2017-0003-EIS) will be available for use before September 2020.</p> <p>Next year, submit a project proposal for this. Identify area(s) needing treatment, acreage, and possible partners. The benefit for this project is to see if we can get the birds to lek back on top of the mountain.</p> <p>Can the BLM develop an educational webinar or presentation for this purpose? Traffic on these roads is not only mining related. Coordination with Eureka County, NDOW, and other land users would be needed to get the word out on how important it is to avoid these roads during lekking season.</p> <p>3-Bars ROD was signed.</p>
Wildlife Management	<p>Collect data on where birds are moving and raising broods – towards Mt. Hope, nearby wet meadow that has been impacted? Springs in Tyrone Gap?</p> <p>Look at perching structures, such as power lines, in area to determine if mitigation measures (e.g. anti-perching devices) need to be installed.</p>	<p>USFS Response: No USFS Response Needed: No NFS lands in PMU</p> <p>BLM-NV Response:</p> <p>Consider submitting a proposal next year as part of this AMRT process for field crews to do collect data on GRSG movement in this area. A possible partnership could be coordinating with NDOW to collar sage-grouse in this area.</p> <p>There is a system of troughs and pipelines from the springs in Tyrone Gap headed south. NDOW (Clint Garrett) asked a few questions about it when we were out in the field. Was the pipeline part of Mt Hope mitigation or was it a Permittee range improvement? Maybe now that there is a trough</p>

		<p>and new water distribution for grazing, the wet meadow would be easier to protect/restore from grazing impacts.</p> <p>Consider submitting a proposal for restoration/protection of the nearby wet meadow (location, acreage, description of what would need to be done for restoration, etc.)</p> <p>APLIC regulations should be followed. ARMPA has RDFs that address power lines and right-of-way renewals. Check the projects associated with power lines in this area and see if this requirement is spelled out in the associated NEPA or ROD.</p>
<p style="text-align: center;"><u><i>Toiyabe PMU Habitat Trigger:</i></u></p> <p style="text-align: center;">Around McGuinness Hills Geothermal. Data known shows this has now hit a population trigger.</p> <p style="text-align: center;">Possible Causal Factor: Mostly attributed to geothermal plants activities including increased vehicle travel, noise, and habitat loss. Another factor includes raven predation.</p>		
Misc	<p>Move to a trigger now to be proactive in addressing decline ASAP.</p> <p>Support continuation on path NDOW is working on with Ormat now to assist entire PMU.</p> <p>Look at mitigation required and make sure BLM ensures it is followed. This would be specific to requirements when specific triggers have been hit.</p> <p>Onsite education with plant employees similar to Gold Bar Mine recommendation on why sage grouse impacts matter.</p>	<p>USFS Response: The Humboldt-Toiyabe National Forest, Austin-Tonopah Ranger District personnel are members of the McGuinness Hills wildlife working group. Through this membership the USFS will continue to support efforts to mitigate effects.</p> <p>BLM-NV Response:</p> <p>Consider submitting a proposal to create an educational brochure, webinar, or presentation, etc. for this purpose to provide the mine employees, contractors, etc. Traffic on these roads is not only mining related. Coordination with Eureka County, NDOW, and other land users would be needed to get the word out on how why impacts to GRSG matters.</p>

5.8 COMMENTS NOT SPECIFIC TO ANY AREA

NDOT Comments:

- **Noxious and invasive weed management:** NDOT recognized the importance of this issue last year and NDOT through the ENV Division now provides funding to the Nevada Department of Agriculture for a NDOT dedicated full-time position to serve as point for NDOT's weed management efforts. This position will provide review of noxious weed management plans submitted by contractors and permittees as well as provide training and specialist assistance to NDOT staff.
- **Fuel Breaks:** generally, highways serve as effective fuel breaks, however any focus to increase the effectiveness of NDOT ROW as fuels breaks must consider Department air quality and stormwater requirements if reducing vegetation is the goal.
- **Wildfire:** NDOT through its District personnel will continue to work closely with wildfire incident teams.
- **Health of grass scrub communities:** NDOT will continue to use native seed mixes as part of its revegetation efforts within NDOT ROW.
- **Wild and estray horse population management:** NDOT supports efforts to manage the populations of wild and estray horses as growing populations have become a safety issue on NDOT roadways.

USFWS Comments:

- The U.S. Fish and Wildlife Service (Service) recommends the Ruby Lakes National Wildlife Refuge be included in the list of interested stakeholders. They have been contacted for a review of this report and their comments are included herein.