

**Sagebrush Ecosystem Council**

**Chris MacKenzie**, Wildlife, Chair  
**Jake Tibbitts**, Local Government, Vice-Chair  
**Steve Boies**, Ranching  
**Kyle Davis**, Mining/Minerals  
**Bevan Lister**, Agriculture  
**William Molini**, Conservation & Environment  
**Sherman Swanson**, General Public  
**Daphne Emm Hooper**, Tribal Nations  
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**Sarah Hale**, State Lands  
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**Joe Lombardo, Governor**

**STATE OF NEVADA**

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August 13, 2024

Jon Raby, State Director  
Bureau of Land Management, Nevada State Office  
1340 Financial Blvd.  
Reno, NV 89502

Dear Mr. Raby:

On behalf of the Sagebrush Ecosystem Council (SEC), I am writing to emphasize the importance of aligning the Bureau of Land Management's (BLM) Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement for Nevada with the existing Nevada Greater Sage-grouse Conservation Plan (State Plan). We believe that a coordinated approach will greatly enhance the effectiveness of sage-grouse conservation efforts while accommodating various land uses across our ecosystem.

The State of Nevada is the first state to recognize a commitment to the conservation of Greater Sage-grouse in statute, which created the SEC, representing multiple stakeholders as well as state and federal agencies. The SEC represents a unified, broad, stakeholder effort including USFS, BLM, and USFWS staff that created the State Plan and the CCS using the best available science, vetted through stakeholder, science work group, and public input, all through a public process. The State Plan includes a robust process for the avoidance and minimization of impacts from anthropogenic disturbances. In instances where impacts cannot be avoided or sufficiently minimized, the State created the CCS, a rigorous, scientifically based mitigation program that achieves net conservation gain for GRSG and a single method for determining mitigation across the entire Sage-grouse Management Area.

We appreciate the opportunity to participate in the process for the Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement and are encouraged by the use of aspects of our State Plan, including mention of state-led mitigation programs like the Conservation Credit System (CCS). We remain troubled, however, that the State Plan was not incorporated in its entirety, and that federal agency actions continue to be used to replace important components of the State Plan. FLPMA and its implementing regulations require that BLM's land use plans be consistent with officially approved state and local plans. The State Plan: has already-established important guidelines and strategies that reflect the unique ecological and socio-economic conditions of our state; is consistent with the purposes, policies, and programs of federal laws and regulations applicable to the

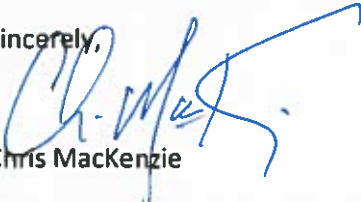
public lands; is based on the best available data and science; was developed entirely in a public and transparent process; and is supported by a wide array of stakeholders across the State of Nevada.

We urge the BLM to fully implement the State Plan as the preferred alternative for Nevada in the FEIS to provide clear, consistent, and effective management of greater sage-grouse habitats. By implementing the State Plan, the BLM can foster collaboration with state agencies, local stakeholders, and conservation partners, ensuring that our collective efforts lead to the best outcomes for both the sage-grouse and the communities that rely on the health of these ecosystems.

Moreover, we would like to propose that the Conservation Credit System be utilized as the primary avenue for mitigation in the BLM plan, rather than relying on the imposition of disturbance caps. The Conservation Credit System has been designed to promote proactive habitat management and conservation actions that benefit sage-grouse populations and their habitats effectively. This approach not only encourages sustainable land use practices, but also provides greater flexibility for landowners and resource developers, resulting in more innovative solutions that can enhance habitat quality. Using the Conservation Credit System as a tool for mitigation will not only help to preserve greater sage-grouse habitats, but will also enable us to engage local communities in a manner that fosters stewardship and shared responsibility for the sagebrush ecosystem.

We appreciate the BLM's ongoing commitment to sage-grouse conservation in Nevada and look forward to working collaboratively as this planning process moves forward. Thank you for considering our recommendations, and we look forward to discussing this further in the near future.

Sincerely,



Chris MacKenzie

Chairman, Sagebrush Ecosystem Council

CC:

Tracy Stone-Manning, Director - BLM

Nada Wolff Culver, Principal Deputy Director - BLM

Jake Tibbitts, Vice-Chair, Local Government Representative - SEC

Steve Boies, Ranching Representative - SEC

Kyle Davis, Mining Representative - SEC

Bevan Lister, Agriculture Representative - SEC

William Molini, Conservation and Environmental Representative - SEC

Sherm Swanson, General Public Representative - SEC

Daphne Emm Hooper, Tribal Nations Representative - SEC

Mathew Johns, Energy Representative - SEC

James Settelmeyer, Director Nevada Department of Conservation & Natural Resources, Ex-Officio -SEC