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Office of the Governor

June 23, 2025

Kimberly Prill, Acting State Director Bureau of Land Management Nevada State Office 1340 Financial Boulevard Reno, Nevada 89502-7147

RE: Governor's Consistency Review – Greenlink North Transmission Project Final EIS and Proposed RMP Amendment

Dear Ms. Prill:

Pursuant to 43 CFR 1610.3-2(e), the State has reviewed the Final Environmental Impact Statement (FEIS) and Proposed Resource Management Plan Amendment (RMPA) for the Greenlink North Transmission Project (GLNP). We appreciate the Bureau of Land Management's coordination with state and local entities throughout the planning process and commend the efforts to advance this nationally significant infrastructure project that supports energy reliability and economic development in Nevada.

As part of this consistency review, the State recommends that the BLM modify or remove the seasonal construction restrictions currently associated with greater sage-grouse habitat protections. Seasonal limitations on surface-disturbing activities in breeding, brood-rearing, and winter habitats would, if applied cumulatively across the GLNP corridor, reduce available construction time to as little as 45 days per year in certain segments. This narrow window would significantly extend construction timelines and result in repeated annual mobilization in sensitive areas, which could increase overall disturbance to greater sage-grouse populations and their habitat.

The State recognizes that thoughtful construction practices and habitat mitigation measures have been incorporated into the project design, including co-location with existing infrastructure, habitat offset investments, and the use of avian-safe structure designs to reduce ecological impacts. These efforts reflect a balanced approach to development and environmental protection.

We understand that the Proposed RMP Amendment includes direction to exempt the GLNP utility corridor from seasonal restrictions associated with sage-grouse management. The State supports this proposed exemption and encourages the BLM to clearly reaffirm this intent in the final Record of Decision. Flexibility in construction timing will facilitate more efficient project delivery while supporting conservation goals through mitigation and best management practices.

Thank you for your consideration of this recommendation. Should your office require additional information or wish to discuss these comments further, please contact Chase McNamara, at cmcnamara@gov.nv.gov

Sincerely,

Joe Lombardo Governor