

# Coalition for Nevada's Wildlife

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Reno, Nevada 89570

Quincy Bahr

Bureau of Land Management

(385) 250-5791

BLM HQ GRSB Planning@blm.gov

Re: Comments to the Public Draft Amendment to Land Use Plans regarding Greater Sage Grouse Conservation and Associated Environmental Impact Statements (EIS) (DOI-BLM-WO-2300-0001-RMP-EIS)

Dear Mr. Bahr,

The Coalition for Nevada's Wildlife is a consortium of northern Nevada sportsmen and conservation organizations that has considerable experience in working through the public involvement process to conserve and enhance Nevada's wildlife resources. We therefore appreciate the opportunity to provide comments on the subject listed above.

Nevada is a very important state for sage grouse because of the significant amount of sage grouse habitat that is contained within its borders. We understand that this current planning effort will result in a Record of Decision for various states and therefore our comments here are primarily directed to the Nevada – Northeastern California Record of Decision (NV-CA Rod).

While the intent of 2015 Greater Sage Grouse Plan and the subsequent 2019 plan was to “conserve enhance and restore sage grouse habitat”, sage grouse populations and habitat have continued to decline in Nevada. If we are to reverse this current decline, we do not believe that the BLM's preferred alternative (alternative 5) in the current proposed Plan Revision is on track to do so. Of special concern to us is the issue of designation of the most important sage grouse habitat for No Surface Occupancy (NSO).

We believe that protections for highest value habitats are diminished in Alternatives 2, 4 and 5, by allowing some development activities in areas that were previously under No Surface Occupancy requirements. We do not believe that compensatory mitigation is a viable alternative to NSO in key sage grouse habitat.

We urge BLM to make avoidance and minimization measures a driving force in the revised plan. While compensatory mitigation is important and certainly has a place in this plan, the driver for mitigation in Nevada is the State of Nevada's Conservation Credit System (CCS ). We are pleased that BLM has recognized the CCS as an acceptable mitigation program to be used on BLM managed public lands, however we feel that the preferred alternative (alternative 5) uncouples the BLM plan from the State of Nevada CCS mitigation program and that this needs to be rectified to clarify the use of the CCS program for mitigation action in Nevada.

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We are concerned that alternatives 4 & 5 seem to weaken the collaboration among BLM, US Fish and Wildlife Service and Nevada Department of Wildlife biologists, when it comes to granting exception to NSO in sage grouse Primary Habitat Management Areas. We recommend that this NV-CA ROD include the coordination provision from the 2015 ARMPA (alt.1).

Nevada is host to over 60 percent of the wild horse in the nation and therefore wild horse's impacts on sage grouse habitat is a major concern. Recent studies by the USGS in Nevada shows that where wild horse are in excess of the appropriate management levels (AML) sage grouse populations are in decline, at the same time where wild horses are at or below appropriate management levels sage grouse populations are stable to increasing (Coates, et, al 2021) The reduction of wild hose populations to AML should be a significant consideration in planning.

Finally, we strongly recommend that the NV-CA ROD contains management objectives that provide the highest conservation standards, (Such as those identified in Alterative 1 or 3.)

We appreciate your serious consideration of our concerns and recommendations.

Sincerely,

The Coalition for Nevada's Wildlife

**Larry J. Johnson – President (also Director of Nevada Outdoorsmen in Wheelchairs, and 30 year past director, Nevada Bighorns Unlimited)**

**Tom Smith – Vice President (also Director & past President, Truckee River Flyfishers)**

**Joel Blakeslee – Director (also Director and past President, Nevada Trapper's Association)**

**Bob Brunner - Director**

**Willie Molini – Director (also President, Nevada Waterfowl Association)**

**Karen Boeger – Director (also Director, Back Country Hunters and Anglers)**

**Judi Caron – Director (also past President, Northern Nevada SCI)**

**Bonnie Flowers – Director**

**Russell Kuhlman – Director (also Executive Director, The Nevada Wildlife Federation)**

**Linda Linton, Esq. - Director**

**Sean Shea - Director (also member Nevada Outfitters and Guide Association)**

**Jim Puryear -- Director (also Director, Nevada Bighorns Unlimited–Reno)**

**Bob Sack – Director (also Nevada Bow Hunters Association)**

**Bryce Pollock, (also Director, Back Country Hunters and Anglers)**

**Tyler Nall – Director**

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