



Office of the
CHURCHILL COUNTY COMMISSIONERS

Carl Erquiaga
Pete Olsen
Bus Scharmann

November 9, 2017

Matt Magaletti, BLM Nevada Lead
1340 Financial Boulevard
Reno, Nevada 89502

Delivered via email to: mmagalet@blm.com
BLM_sagegrouseplanning@blm.gov
Also submitted online at: <http://bit.ly/GRSGplanning>

RE: Churchill County, Nevada Comments Regarding Potential Amendments to the Nevada and Northeastern California Greater Sage-Grouse Approved Resource Management Plan Amendment, dated September 2015

Dear Mr. Magaletti:

Churchill County, Nevada (County) would like to thank the BLM for reviewing and possibly amending the Nevada and Northeastern California Greater Sage-Grouse Approved Resource Management Plan Amendment (ARMPA) dated September 2015. As this process moves forward, Churchill County would like to formally request cooperating status. A Cooperating Agency Return Form dated November 3, 2017 is attached for your reference and has also previously been returned via email. The county is directly affected by the ARMPA as much of the public land in the county is administered through the Carson City BLM District.

General Comments Pertinent to a Potential Plan Amendment

In its notice of intent, the BLM specifically asked if any ARMPA amendments should be considered on a state-by-state basis. The county strongly believes that a state-by-state process is the only process that will work given each state's unique issues and approach to addressing Sage-grouse conservation. The county also believes that the process used to develop the ARMPA was artificially compressed due to judicially mandated timeframes that were not conducive to a robust process, nor adequate cooperation and collaboration between federal, state and local stakeholders. As a result, the ARMPA contains multiple inconsistencies with the 2014 Nevada Greater Sage-grouse Conservation Plan (State Plan).

As a local stakeholder, the county finds the combination of the State Plan, BLM ARMPA, ARMPA clarifications, and related national Instruction Memorandum to be muddled and confusing. Any efforts to make these various documents more consistent, consolidated and streamline would be of great value to the county and other local stakeholders. The county would be in favor of a potential targeted ARMPA Amendment, if warranted, to address inconsistencies with the State Plan, so long as such an amendment doesn't jeopardize the US Fish and Wildlife Service's "not warranted" finding. In order to accomplish this, the county strongly believes it will require an open dialogue through the NEPA process between the federal agencies, State Sagebrush Ecosystem Program (through its Sagebrush Ecosystem Council), and local stakeholders, as well as the US Fish and Wildlife Service, and Nevada Department of Wildlife.

Specific Comments Pertinent to a Potential Plan Amendment

Habitat Boundaries:

The county has a concern with the difference between the maps adopted by the BLM through its ARMPA and the State of Nevada's maps. The attached maps show the significant differences in habitat mapping in Churchill County, and these differences need to be reconciled. Further, the county supports the State of Nevada maps as we believe they are more accurate and reflective of habitat in this county.

Regarding the 'flexibility' of maps, as has been discussed in recent scoping meetings, the county understands that maps may require period updating (flexibility) to reflect new or more robust information based on monitoring of Sage-grouse populations. However, any changes to Sage-grouse habitat mapping should be based on scientifically defensible data and a robust process that ensures durability of the ARMPA.

Churchill County-specific Issues:

Due in large part to the inconsistencies associated with habitat mapping, the county's major concerns revolve around the potential for impacts of the ARMPA on county customs, culture and economy as described in Section 12 *Policy Plan for Public Lands of the Churchill County 2015 Master Plan*. This concern is pertinent to any further impact or restriction of public land uses, such as recreation, grazing, renewable energy development (in particular geothermal development), and mining. Any amendments must address these impacts at the local level. This concern has recently been heightened due to the proposed withdrawal of large tracts of public lands currently administered by the BLM because of the Fallon Range Training Complex Modernization Project proposed by the US Navy, coupled with potential land use restrictions proposed in the Draft Carson City District RMP.

The county has noticed that the BLM does not appear to have adequate staff or budget to implement the full breadth and depth of ARMPA. In addition, due to staff time dedicated to ARMPA implementation, other projects and associated timelines have been impacted. For example, a Final Resource Management Plan for the Carson District of the BLM has yet to be issued, in part due to the uncertain nature of the ARMPA. The county would ask that the BLM and Department of Interior seek ways to implement the ARMPA, while at the same time allowing the BLM to move forward with important projects that don't have a Sage-grouse nexus.

Nevada-specific Issues:

The Nevada Sagebrush Ecosystem Program and the Nevada Governor's Office have both done extensive work to identify differences between the BLM's ARMPA and the State Plan. The county strongly recommends that the BLM and Department of Interior's Review Team work directly with these two entities to reconcile these differences in a manner that does not jeopardize the "not warranted" finding.

SFA Designation:

At present, the ARMPA does not designate SFAs in the county. The State Plan does not contain an equivalent "SFA" designation. To reiterate, the county supports the habitat mapping and nomenclature ("priority", "general" and "other" habitat designations) found in the State Plan. Even though the county does not contain SFA designations, such designations in other counties could likely result in prioritizing

critical/limited conservation efforts and funds (i.e. wildfire suppression and rehabilitation, wild horse gathers, etc.) away from the county, which could be detrimental to both its Sage-grouse populations and land uses.

Mitigation Standards:

It is unclear to the county how and when mitigation for Sage-grouse projects is determined and which entity has the final say in approving such mitigation. It is also unclear which mitigation "program" (individual agreements with US Fish and Wildlife Service versus mitigation through the BLM ARMPA, versus mitigation through the State of Nevada's Conservation Credit System) is applied on a case-by-case basis. Not only do mitigation standards need to become more standardized, the various agencies need to provide some level of consistency and training so that local stakeholders and industry has a clearer understanding as to their options and approval of mitigation.

Lek Buffers, Disturbance and Density Caps, and Reversing Adaptive Management Responses:

It is the county's understanding that all of these issues have inconsistencies between the BLM's ARMPA and the State Plan. Again, the county supports the BLM and State (through its Sagebrush Ecosystem Council) working through an open and transparent process to rectify these inconsistencies with robust input and involvement from local government, the US Fish and Wildlife Service and the Nevada Department of Wildlife.

General Comments to New Issues Raised in Secretarial Order 3353 or Related Department of Interior Review Team Report

Section 4, Item v of Secretarial Order 3353 states that:

As appropriate, the Team should provide recommendations with regard to (1) captive breeding; (2) opportunities to enhance State involvement; (3) efficacy of target populations on a State-by-State basis; and (4) additional steps that can be taken in the near term to maintain or improve the current population levels and habitat conditions.

Churchill County strongly believes that:

- Item 4 should be the number 1 priority, particularly in regard to management of wildfires, invasive species and unmanaged wild horse populations that continue to have negative impacts on Sage-grouse habitat within the county.
- Item 1 should be tabled from consideration. The BLM and other federal agencies are already thin on budget and staff, adding a new program that has marginal potential for success should not take away from addressing the imminent threats to Sage-grouse habitat as well as local customs, cultures and economies.
- Item 2 should include "local" involvement.
- Item 3 should be clarified. The county is skeptical of setting population objectives in a state that experiences major climatic swings on an annual basis for a species whose populations fluctuates given such swings.

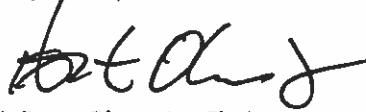
General Comments to Issues to be Resolved Through Policy or Administrative Action; or, Issues Beyond the Scope of the Plan Amendment(s)

The county would be in favor of any efforts to clarify and consolidate Sage-grouse conservation policies and management direction through means such as policy, training and plan maintenance; however, the BLM, State and local stakeholders need to have an open dialogue as to how to complete such actions without making the process and documentation even more cumbersome and confusing than it already is.

Specific to the county, there are two key issues that continue to impact Sage-grouse conservation and the county's customs, culture and local economy. They are wildfire and a lack of management of wild horses. While the ARMPA addresses these two items, neither has been managed in an effective manner in the county's view. The county believes there is a fundamental flaw in the way resources (both budget and staff) are allocated to deal with these two items, and until that is resolved the ARMPA will never be fully implemented nor effective.

The county appreciates the opportunity to provide its initial inputs to this process. The county stands ready to engage in whatever process is taken to improve Sage-grouse Conservation while also maintaining the county's customs, culture and economy for this and future generations.

Respectfully,



H. Peter Olsen, Jr., Chair
Churchill County Commission

cc: Brian Sandoval, Governor
Nevada Congressional Delegation
Nevada Association of Counties
Nevada Sagebrush Ecosystem Council

Attachments: Cooperating Agency Return Form dated 11-3-2017
State of Nevada Map of Sage-grouse Habitat in Churchill County
BLM Map of Sage-grouse Habitat in Churchill County

COOPERATING AGENCY RETURN FORM

Cooperating Agency Representative:

This form is provided for your convenience in responding to the Bureau of Land Management's (BLM) invitation to becoming a cooperator with the BLM in preparation of a Land Use Plan Amendment within Nevada regarding Greater sage-grouse conservation and supporting Environmental Impact Statement (EIS).

Please fill out and return this form. Be assured that we will follow up with you in accordance with your response.

- Our agency has decision making authority or special expertise and would like to become a cooperator with BLM.
- The information that you have provided is sufficient, and we do not desire to become a cooperator at this time. We do, however, request updates on the draft and final EISs and associated documents generated during the development of the Land Use Plan Amendment.
- Thank you for your correspondence. Our agency has no further interest in this planning process and request you remove us from your mailing list.

Name of individual responding to this form:

ELEANOR LOCKWOOD

(Please print)

Title:

COUNTY MANAGER [CHURCHILL COUNTY]

(Please print)

Phone:

775-423-5136

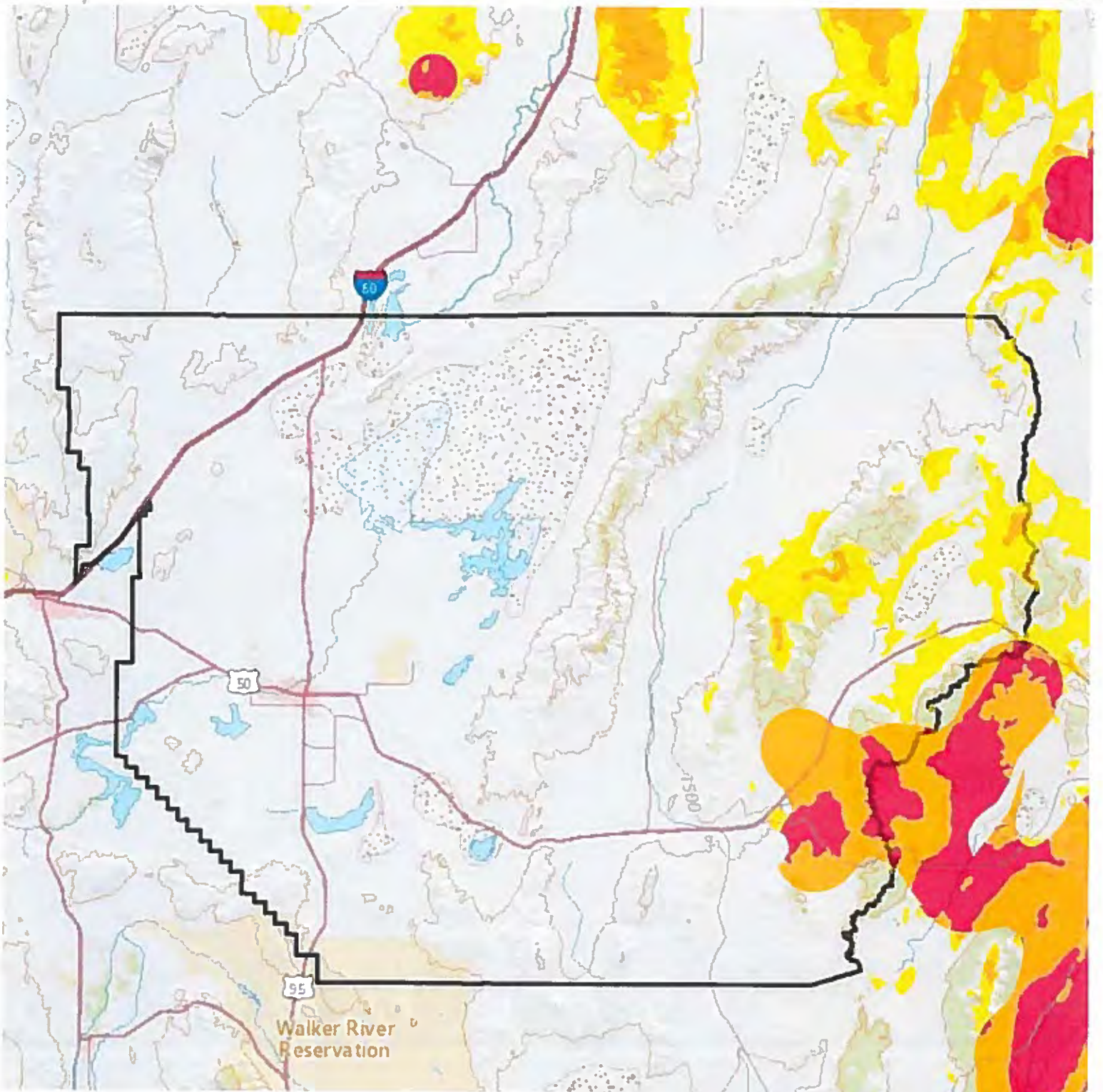
email:

countymanager@churchillcounty.org

Signature:

Eleanor Lockwood

Date 11-3-2017



Legend

***Nevada Sage-Grouse Management Categories**

- PHMA
- GHMA
- OHMA



**Nevada SEC Management
Category Map
for Churchill County**



**Nevada Sagebrush Ecosystem Council:
Management Category Map, December 2015*

