
Chapter 6

Consultation and Coordination

TABLE OF CONTENTS

Chapter		Page
6.	CONSULTATION AND COORDINATION	6-1
6.1	Introduction	6-1
6.2	Collaboration.....	6-1
6.2.1	Native American Tribal Consultation.....	6-2
6.2.2	California and Nevada State Historic Preservation Officer Consultation	6-21
6.2.3	US Fish and Wildlife Service Consultation	6-22
6.3	Cooperating Agencies/Entities.....	6-23
6.4	Coordination and Consistency.....	6-26
6.4.1	Inconsistencies with State Plans, Policies, and Procedures.....	6-27
6.4.2	Inconsistencies with County Plans, Policies, and Procedures	6-28
6.4.3	Inconsistencies with Tribal Plans, Policies, and Procedures	6-29
6.5	Resource Advisory Councils.....	6-29
6.6	Public Involvement.....	6-30
6.6.1	Scoping Process.....	6-31
6.6.2	Public Comment on the Draft LUPA/EIS.....	6-32
6.6.3	Future Public Involvement.....	6-41
6.7	List of Preparers.....	6-41

TABLES

	Page	
6-1	Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region GRSB Draft LUPA/EIS.....	6-2
6-2	Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region Greater Sage-Grouse Proposed LUPA/Final EIS.....	6-12
6-3	Cooperating Agencies/Entities.....	6-24
6-4	Number of Unique Submissions and Comments by Affiliation	6-36
6-5	Number of Comments on the Draft LUPA/EIS by Category	6-37
6-6	Overview of Comments by Category	6-39
6-7	List of Preparers.....	6-42

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CHAPTER 6

CONSULTATION AND COORDINATION

6.1 INTRODUCTION

This chapter describes the public outreach and participation opportunities made available through the development of this LUPA/EIS and consultation and coordination efforts with tribes, government agencies, and other stakeholders. This chapter also lists the interdisciplinary team of staff who prepared the LUPA/EIS.

The BLM and Forest Service land use planning activities are conducted in accordance with requirements of the NEPA, FLPMA, NFMA, CEQ regulations, BLM policies and procedures implementing NEPA, and US Department of Agriculture and Forest Service policies and procedures implementing NEPA. NEPA and associated laws, regulations, and policies require the BLM and Forest Service to seek public involvement early on and throughout the planning process to develop a reasonable range of alternatives to proposed actions and to prepare environmental documents that disclose the potential impacts of proposed actions and alternatives. Public involvement and agency consultation and coordination, which have been at the heart of the planning process leading to this Proposed LUPA/Final EIS, were achieved through Federal Register notices, public and informal meetings, individual contacts, media releases, and the Greater Sage-Grouse Planning Strategy Northeastern California and Nevada Sub-Region project website:

<http://www.blm.gov/wo/st/en/prog/more/sagegrouse/western.html>

6.2 COLLABORATION

Federal laws require the lead agency to consult with certain federal and state agencies and entities and Native American tribes (40 CFR 1502.25) during the NEPA decision-making process. Federal agencies are also directed to integrate NEPA requirements with other environmental review and consultation requirements to reduce paperwork and delays (40 CFR 1500.4-5).

In addition to formal scoping (**Section 6.4.1**, Scoping Process), the BLM and Forest Service have implemented an extensive collaborative outreach and public involvement process that has included coordinating with cooperating agencies, holding public scoping meetings, holding a socioeconomic workshop, and holding public open houses for the Draft LUPA/EIS. The BLM and Forest Service will continue to meet with interested agencies and organizations throughout the planning process, as appropriate.

6.2.1 Native American Tribal Consultation

The BLM and Forest Service began tribal consultation by requesting a consultation meeting with area tribes to discuss the details of the GRSG planning efforts. Each of the tribes was also invited to participate in the planning effort as cooperating agencies. The list of tribes contacted, as well as the results of consultation to date, are described in **Table 6-1** and **Table 6-2**.

Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
Battle Mountain Band	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/5/2012—Consultation invitation letter sent.	
	7/25/2012—Consultation with Battle Mountain Band (Vice Chair and tribal members), BLM Battle Mountain District (Doug Furtado and Tim Coward), and Forest Service (Steve Williams).	Tribe mentioned concerns that disturbance from people and crows eating eggs are affecting GRSG populations.
Yomba Shoshone	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/5/2012—Consultation invitation letter sent.	
	6/8/2012—Consultation with Yomba Shoshone (Chair and tribal members), BLM Battle Mountain District (Chris Cook and Tim Coward), and Forest Service (Steve Williams).	No GRSG-related comments received.
Fallon Paiute	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/12/2012—Consultation invitation letter sent.	
	7/17/2012—Consultation with Fallon Paiute (Vice Chair and tribal members), BLM Carson City District (Teresa Knutson and Susan McCabe).	Tribe expressed concerns about restricted access to pine nutting areas. Tribal members sometimes access pine nutting areas by OHVs and 4-wheel drive vehicles. Tribe expressed concerns that the current drought and jets breaking the sound

Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
		barrier may disrupt GRSGs, especially during hatching season.
Reno-Sparks Indian Colony (RSIC)	11/17/2011—Consultation with RSIC (Michon Eben, Cultural Resource Director), and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	3/1/2012—Phone Conversation with RSIC (Michon Eben) and BLM Carson City District (Jim Carter).	Tribe has concerns with GRSG habitat.
	4/6/2012—Consultation with RSIC (Michon Eben, Cultural Resource Director) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	6/12/2012—Consultation invitation letter sent—Carson City District.	No GRSG-related comments received.
	7/2/2012—Update on LUPA/EIS sent.	No GRSG-related comments received.
	9/19/2012—Consultation with RSIC (Michon Eben, Cultural Resource Director) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	2/1/2013—Consultation with RSIC (Michon Eben, Cultural Resource Director) and BLM Eagle Lake Field Office (Ken Collum, Sharynn Blood, and Marilla Baker).	No GRSG-related comments received.
Walker River Paiute	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/12/2012—Consultation invitation letter sent.	
	6/29/2012—Consultation with Walker River Paiute (Vice Chair and tribal members), BLM Carson City District (Teresa Knutson and Susan McCabe).	No GRSG-related comments received.
Washoe	11/1/2011—Consultation with Washoe Tribe (Darrel Cruz, Tribal Historic Preservation	No GRSG-related comments received.

Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
	Officer) and BLM Eagle Lake Field Office (Sharynn Blood).	
	12/7/2011—Invitation as cooperating agency.	Signed MOU as a cooperating agency. Comments received on May 8, 2013. Tribe is concerned about invasive species, as well as the impact of tree thinning projects on juniper trees, which are important to the tribe.
	2/29/2012—Phone conversation with Washoe Tribe (Darrel Cruz, Washoe Tribal Historic Preservation Officer) and BLM Carson City District (Jim Carter).	Tribe is very concerned about GRSG habitat.
	3/2/2012—Phone conversation with Washoe Tribe (Marie Barry, Washoe Environmental Director) and BLM Carson City District (Jim Carter).	Tribe has previously commented on GRSG and habitat for Pine Nut Plan Amendment, and hopes those comments will be moved forward during the BLM's GRSG planning.
	4/18/2012—Update on LUPA/EIS sent and phone call.	No GRSG-related comments received.
	6/12/2012—Consultation invitation letter sent by Carson City BLM.	No GRSG-related comments received.
	7/2/2012—Update on LUPA/EIS sent by Eagle Lake Field Office.	No GRSG-related comments received.
	11/13/2012—Consultation with Washoe Tribe (Darrel Cruz, Tribal Historic Preservation Officer) and BLM Eagle Lake Field Office (Sharynn Blood).	No GRSG-related comments received.
Yerington Paiute	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	3/1/2012—Phone conversation with Yerington (Shelly Pugh) and BLM Carson City District (Jim Carter).	No GRSG-related comments received.
	6/12/2012—Consultation invitation letter sent.	No further contacts.

Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
Duck Valley Sho-Pai	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/6/2012—Consultation invitation letter sent.	
	6/26/2012—Consultation with Duck Valley Sho-Pai (Chairman, Vice-Chair, tribal facilitator, tribal members) and Forest Service (Jeanne Higgins).	Tribe is concerned that cattle grazing and military flights negatively impact GRSG populations. In particular, sonic booms from military jets adversely impact GRSG eggs and breeding at leks.
	8/3/2012—2nd consultation invitation letter sent by Elko BLM.	No GRSG-related comments received.
Te-Moak Tribe	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/6/2012—Consultation invitation letter sent.	
	8/3/2012—2nd consultation invitation letter sent by Elko BLM.	No GRSG-related comments received.
Wells Band	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/6/2012—Consultation invitation letter sent.	
	8/3/2012—2nd consultation invitation letter sent by Elko BLM.	No GRSG-related comments received.
South Fork Band	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/6/2012—Consultation invitation letter sent.	
	8/3/2012—2nd consultation invitation letter sent by Elko BLM.	No GRSG-related comments received.
Elko Band	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/6/2012—Consultation invitation letter sent.	
	8/3/2012—2nd consultation invitation letter sent by Elko BLM.	No GRSG-related comments received.
Goshute Tribe	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	2/10/2012—Consultation with Goshute Tribe (Chair and tribal members), BLM Utah (Kevin Oliver and Quincy Bahr), and BLM Ely District	No GRSG-related comments received.

**Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS**

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
	(Elvis Wall). 6/6/2012—Consultation invitation letter sent. 7/6/2012—Consultation with Goshute Tribe (Chair, Vice Chair, and tribal members), BLM Ely District (Michael Herder and Elvis Wall), and Forest Service (Jose Noriega).	Tribe identified GRSG habitat on the reservation. Tribe was concerned that Nevada BLM and Utah might not have a consistent approach toward GRSG management. Tribe was concerned how the GRSG plan would affect grazing. Tribe supports efforts to enhance GRSG habitat.
Duckwater	12/7/2011—Invitation as cooperating agency. 6/6/2012—Consultation invitation letter sent. 7/2/2012—Consultation with Duckwater Tribe (Chair and tribal members) and BLM Ely District (Rosemary Thomas, Miles Kreidler, and Elvis Wall).	Did not sign MOU as a cooperating agency. No GRSG-related comments received.
Ely Shoshone	12/7/2011—Invitation as cooperating agency. 6/6/2012—Consultation invitation letter sent. 7/10/2012—Consultation with Ely Shoshone Tribe (Chair and tribal members) and BLM Ely District (Rosemary Thomas and Elvis Wall).	Did not sign MOU as a cooperating agency. Tribe noted that there are GRSG habitat areas in the reservation lands. Tribe expressed concerns that the undertaking might restrict their access to pine nutting areas and wild game hunting through road closures. Tribe expressed concern that GRSG are a hunted species at the same time their numbers are dwindling.
Pyramid Lake Paiute	12/7/2011—Invitation as cooperating agency. 2/29/12; 3/1/2012—Left phone messages regarding letter of 12/7/2011. 4/26/12—Consultation with Pyramid Lake Paiute Tribe (Chair and tribal members) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood). 6/8/2012—Consultation invitation letter sent.	Signed MOU as a cooperating agency. No GRSG-related comments received. Tribe asked if it is possible to manage for both cattle and birds. The BLM responded that it should be possible.

Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
	6/27/2012—Consultation with Pyramid Lake Paiute Tribe (Chair and tribal members) and BLM Winnemucca District (Mark Hall).	Tribe indicated that GRSG was a sacred bird, but they needed to balance this interest with economic reality of grazing and energy development. Tribe hopes the LUPA/EIS will result in better grazing management practices. Corvids and raptors nesting on utility and transmission lines are negatively impacting GRSG populations.
	7/2/2012—Update on LUPA/EIS sent.	No GRSG-related comments received.
	1/23/2013—Consultation with Pyramid Lake Paiute Tribe (Chair, Vice Chair, Tribal Historic Preservation Officer, tribal members) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
Summit Lake Paiute	12/7/2011—Invitation as cooperating agency.	Signed MOU as a cooperating agency. Comments received on May 8, 2013.
	6/8/2012—Consultation invitation letter sent.	Tribe is concerned that current planned projects involving road realignments and land acquisition to expand reservation boundaries may be impacted. Tribe is concerned that restrictions may be placed on tribal members observing lekking behavior for traditional cultural practices. Tribe believes wild horses are impacting GRSG leks, and additional conservation measures may be necessary to reduce these impacts.
	7/21/2012—Consultation with Summit Lake Paiute Tribe (Chair and tribal members) and BLM Winnemucca District (Gene Seidlitz and Mark Hall).	Tribe indicated they would work with the USFWS to complete a GRSG survey and banding of birds on their reservation lands. Tribe feels that OHV use is negatively impacting GRSG populations.
Fort McDermitt	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency.
	6/8/2012—Consultation invitation letter sent.	

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Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS**

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
	6/18/2012—Consultation with Fort McDermitt Tribe (Chair and tribal members) and Forest Service (Jeff Ulrich).	Tribe expressed desire to be more involved in the LUPA/EIS process, especially the Governor’s alternative.
	7/17/2012—Consultation with Fort McDermitt Tribe (Chair and tribal members) and BLM Winnemucca District (Gene Seidlitz, Mark Hall, and Kathy Ataman).	Tribe has particular concerns with GRSG populations in the Double H Mountains. Tribe has multiple needs; they recognize that cattle ranching can pose a threat to GRSGs, yet they rely on ranching activities as well. GRSG hold a special role for the tribes in traditional culture. Tribe is concerned that NDOW allows GRSG to be hunted while their numbers are in decline.
Lovelock Colony	12/7/2011—Invitation as cooperating agency. 6/8/2012—Consultation invitation letter sent. 9/19/2012—Consultation with Lovelock Colony (Chair) and BLM Winnemucca District (Ken Loda and Mark Hall).	Did not sign MOU as a cooperating agency. No GRSG-related comments received.
Winnemucca Colony	12/7/2011—Invitation as cooperating agency. 6/8/2012—Consultation invitation letter sent.	Did not sign MOU as a cooperating agency. No GRSG-related comments received.
Pit River Tribe	10/6/2011—Consultation invitation letter sent. 12/7/2011—Invitation as cooperating agency. 1/5/2012—Consultation with Pit River Tribe (Chair, Vice-Chair, and tribal members) and BLM Alturas, Eagle Lake, and Redding Field Offices (Tim Burke, Ken Collum, Jennifer Mata, Dennis Benson, Eric Ritter, Jack Scott, Sharynn Blood, Charlie Wright, Randy Chatterton, Jim Hunt, and Dereck Wilson). 4/5/2012—Consultation with Pit River Tribe (Chair, Vice-Chair, and tribal members) and BLM Alturas, Eagle Lake, and Redding Field Offices (Tim Burke, Ken Collum, Jennifer Mata, Eric Ritter, Jack Scott, and Sharynn Blood).	Did not sign MOU as a cooperating agency. No GRSG-related comments received. No GRSG-related comments received.

**Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS**

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
	7/5/2012—Consultation with Pit River Tribe (Chair, Vice-Chair, and tribal members) and BLM Alturas and Eagle Lake Field Offices (Tim Burke, Ken Collum, Jack Scott, Sharynn Blood, Spencer Pelton, Jen Rovanpera, and Devin Snyder).	No GRSG-related comments received.
	10/4/2012—Consultation with Pit River Tribe (Chair, Tribal Historic Preservation Officer, and tribal members) and BLM Alturas and Eagle Lake Field Offices (Tim Burke, Ken Collum, Jack Scott, Sharynn Blood, Jen Rovanpera, Rich Estabrook, and James Haerter).	No GRSG-related comments received.
	2/7/2013—Consultation with Pit River Tribe (Chair and tribal members), BLM Alturas and Eagle Lake Field Offices (Tim Burke, Ken Collum, David Scott, Sharynn Blood, Jen Rovanpera, and Emily Jennings).	One tribal member noted that wind farms do not seem conducive to GRSG habitat. Another tribal member discussed porcupines and GRSGs and the irony of forest management plans. The Forest Service used to kill porcupines because they were killing the juniper trees. Now the Forest Service is killing the juniper trees to conserve water. She then wondered what would be next: Would the Forest Service then plant trees that need water?
Klamath Tribes	12/7/2011—Invitation as cooperating agency.	Did not sign MOU as a cooperating agency and no specific comments received.
	2/1/2012—Consultation with Klamath Tribe (Perry Chocktoot, Klamath Tribes Cultural and Heritage Department Director) and BLM Alturas Field Manager (Tim Burke).	No GRSG-related comments received.
Susanville Indian Rancheria (SIR)	8/3/2011—Consultation invitation letter sent.	No GRSG-related comments received.
	8/3/2011—Consultation with SIR (Chair, Tribal Historic Preservation Officer, tribal members) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.

Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
	12/7/2011—Invitation as cooperating agency.	Signed MOU as a cooperating agency. No GRSG-related comments received.
	10/20/2011—Consultation with SIR (Chair, Tribal Historic Preservation Officer, tribal members) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	1/6/2012—Consultation with SIR (Chair, Tribal Historic Preservation Officer, tribal members) and BLM Eagle Lake Field Office (Ken Collum, Sharynn Blood, Charlie Wright, Randy Chatterton, Dereck Wilson, and Jim Hunt).	No GRSG-related comments received.
	1/10/2012—Consultation with SIR (Chair, Tribal Historic Preservation Officer, tribal members) and BLM Alturas Field Office (Tim Burke and David Scott).	No GRSG-related comments received.
	4/6/2012—Consultation with SIR (Chair and tribal members) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	7/6/2012—Consultation with SIR (Tribal Historic Preservation Officer and tribal members) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	10/5/2012—Consultation with SIR (Chair and Tribal Historic Preservation Officer) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	1/16/2013—Consultation with SIR (tribal members) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood).	No GRSG-related comments received.
	4/12/2013—Consultation with SIR (Vice Chair, Tribal Historic Preservation Officer, tribal members) and BLM Eagle Lake Field Office (Sharynn Blood).	No GRSG-related comments received.

**Table 6-1
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
GRSG Draft LUPA/EIS**

Tribe	Letters Sent, Phone Calls Made, Consultation Meetings Held	Results
Greenville Rancheria	12/7/2011—Invitation as cooperating agency. 5/8/2012—Consultation invitation letter sent. 5/18/2012—Consultation with Greenville Rancheria (Lacie Miles, Environmental Director) and BLM Eagle Lake Field Office (Ken Collum and Sharynn Blood). 7/2/2012—Update on LUPA/EIS sent. 10/11/2012—Consultation with Greenville Rancheria (Lacie Miles, Environmental Director) and BLM Eagle Lake Field Office (Sharynn Blood). 1/25/2013—Update on LUPA/EIS sent.	Did not sign MOU as a cooperating agency. No GRSG-related comments received. No GRSG-related comments received. No GRSG-related comments received.
Hanylekim Maidu (Not Federally Recognized)	12/7/2011—Invitation as cooperating agency. 7/2/2012; 11/30/2012; 1/30/2013—Updates on LUPA/EIS sent.	Did not sign MOU as a cooperating agency. No GRSG-related comments received.
Fort Bidwell Tribe	12/7/2011—Invitation as cooperating agency. 1/21/2012—Consultation invitation letter sent. 11/14/2012—Consultation with Fort Bidwell Tribe (tribal members), and BLM Surprise Field Office (Tim Burke). 3/9/2013—Consultation with Fort Bidwell Tribe (tribal members), and BLM Surprise Field Office (Tim Burke).	Did not sign MOU as a cooperating agency. Tribe commented that the LUPA/EIS sounded like a good idea. No GRSG-related comments received. No GRSG-related comments received.
Cedarville Rancheria	12/7/2011—Invitation as cooperating agency. 1/3/2012—Consultation invitation letter sent. 2/28/2013—Consultation with Cedarville Rancheria (Tribal Administrator and tribal members) and BLM Surprise Field Office (Tim Burke).	Did not sign MOU as a cooperating agency. No GRSG-related comments received.

**Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS**

Date	Federal Agency	Outreach	Tribes
July 12, 2013	BLM—Alturas and Eagle Lake Field Offices	Face-to-face consultation: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. These alternatives are now out for internal review and are scheduled for review by cooperating agencies in July 2013. The public comment period is scheduled for later in the summer of 2013. The draft alternatives contain many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining.	Susanville Indian Rancheria
July 13, 2013	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS updates. The BLM was asked how many GRSG were in the field office area, 6,000 to 7,000 currently.	Fort Bidwell Tribe
August 1, 2013	BLM—Alturas and Eagle Lake Field Offices	Face-to-face consultation: The Draft LUPA/EIS should be available for review by September 2013 (subsequent proposed release date was October 10, 2013). There will be a 90-day comment period with the Proposed LUPA/Final EIS due in spring 2014, followed by a record of decision.	Pit River Tribe
August 6, 2013	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. These alternatives are now out for internal review and are scheduled for review by cooperating agencies in July 2013. The public comment period is scheduled for fall 2013. The draft alternatives contain many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining.	Washoe
August 9, 2013	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. These alternatives are now out for internal review and are scheduled for review by cooperating agencies in July 2013. The public comment period is scheduled for fall 2013. The draft alternatives contain many new restrictions for development in GRSG-	Reno-Sparks Indian Colony

Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS

Date	Federal Agency	Outreach	Tribes
		occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining.	
August 29, 2013	BLM—Eagle Lake Field Office	E-mail or mail project updates, including GRSG LUPA/EIS update: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. These alternatives are now out for internal review and are scheduled for review by cooperating agencies in July 2013. The public comment period is scheduled for early fall 2013. The draft alternatives contain many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining.	Pyramid Lake Paiute Tribe Greenville Rancheria Honey Lake Maidu
September 12, 2013	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update. The tribe asked for a copy of the GRSG LUPA/EIS.	Cedarville Rancheria
October 19, 2013	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The BLM informed the tribe that the draft GRSG LUPA/EIS will be released in November 2013, and there was going to be a public meeting in Cedarville on December 3, 2013, to discuss it.	Summit Lake Tribe
October 25, 2013	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. These alternatives are now out for internal review and are scheduled for review by cooperating agencies in July 2013. The public comment period is scheduled for later in the summer of 2013. The draft alternatives contain many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining.	Susanville Indian Rancheria
November 1, 2013	BLM—Winnemucca District	Phone calls to tribes informing them of the release of the Draft LUPA/EIS for comment.	Fort McDermitt Tribe Pyramid Lake Paiute Tribe Summit Lake Paiute Tribe Lovelock Paiute Tribe

**Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS**

Date	Federal Agency	Outreach	Tribes
November 1, 2013	BLM—Ely District	Phone calls to tribes informing them of the release of the Draft LUPA/EIS for comment. Requested to be on agenda of the December 6, 2013, Goshute Tribal Council meeting, the agenda of the November 12, 2013, Ely Shoshone Tribal Council meeting, and the agenda of the November 25, 2013, Duckwater Tribal Council meeting.	Duckwater Shoshone Tribe Ely Shoshone Tribe Goshute Tribe
November 1, 2013 November 5, 2013	BLM—Elko District	Phone calls to tribes informing them of the release of the Draft LUPA/EIS for comment. Informed tribes of GRSG Draft LUPA/EIS open house to be held at the BLM Elko District Office on December 11, 2013.	TeMoak Tribe of Western Shoshone Elko Band South Fork Band
November 4, 2013	Forest Service	Attended 48th Annual Inter-Tribal Council of Nevada Executive Session in Reno, Nevada. Hand-delivered hard copies and digital copies of the Draft LUPA/EIS and Draft LUPA/EIS Executive Summary.	Battle Mountain Band Carson Colony Community Council Duckwater Shoshone Tribe Elko Band Ely Shoshone Tribe Fallon Paiute-Shoshone Tribe Fort McDermitt Tribe Goshute Tribe Moapa Tribe Pyramid Lake Paiute Tribe Reno-Sparks Indian Colony South Fork Band Stewart Community Council Timbisha Shoshone Tribe TeMoak Tribe of Western Shoshone Walker River Paiute Tribe

Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS

Date	Federal Agency	Outreach	Tribes
			Washoe Tribe Wells Band Woodsford Community Council Yomba Shoshone Tribe
November 5, 2013	Forest Service	Phone call and e-mail to tribe informing them of the release of the Draft LUPA/EIS for comment.	Duck Valley Sho-Pai Tribe
November 7, 2013	BLM—Alturas and Eagle Lake Field Offices	Face-to-face consultation, including GRSG LUPA/EIS update: Draft LUPA/EIS issued on November 1, 2013, contains six alternatives and a 90-day public comment period. The document is long, so focus is best spent on Chapter 2, which outlines the preferred alternatives. Public meetings are planned for December 3 in Cedarville, December 4 in Susanville, and December 5 in Reno. Other meetings will be held elsewhere throughout Nevada as well.	Pit River Tribe
November 20, 2013	BLM—Eagle Lake Field Office	E-mail or mail project updates, including GRSG LUPA/EIS update (Draft LUPA/EIS is out for comment and CD is available): The BLM has been working on a Draft LUPA/EIS for the GRSG LUPA/EIS. The Draft LUPA/EIS contains many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining. The Draft LUPA/EIS is available on-line at http://www.blm.gov/nv/st/en/prog/wildlife/greater_sage-grouse.html . A public meeting will be held in Susanville in Jensen Hall at the Lassen County Fairgrounds on December 4, 2013, from 5:30 to 7:30 pm. A Sage-Grouse Newsletter was also distributed.	Pyramid Lake Paiute Tribe Washoe Greenville Rancheria Reno-Sparks Indian Colony Honey Lake Maidu
December 12, 2013	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS updates. Tribe wanted to know why there is a hunting season if GRSG are going to be endangered and why, if the BLM works with state agencies, are the ideas of GRSG management so different?	Fort Bidwell Tribe

Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS

Date	Federal Agency	Outreach	Tribes
December 13, 2013	BLM—Battle Mountain District	Government-to-government meeting with tribal council. Presented tribe with digital copy of the Draft LUPA/EIS, as well as handouts that were available at a GRSG Draft LUPA/EIS open house held earlier in Austin, Nevada.	Yomba Shoshone Tribe
January 10, 2014	BLM—Alturas and Eagle Lake Field Offices	Face-to-face consultation, including GRSG LUPA/EIS updates. The BLM has been working on draft alternatives for the GRSG LUPA/EIS. The Draft LUPA/EIS is out for public comment until January 29, 2014. The Proposed LUPA/Final EIS is expected to be out in June 2014.	Susanville Indian Rancheria
January 15, 2014	BLM—Alturas Field Office	Face-to-face consultation, including GRSG LUPA/EIS updates. Draft LUPA/EIS is out for comment, and the BLM has been working on draft alternatives of the GRSG LUPA/EIS. At this consultation, the BLM Alturas Field Office was informed that the GRSG taught the Klamath Tribes to dance.	Klamath Tribes
January 18, 2014	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update.	Summit Lake Tribe
January 29, 2014	BLM—Eagle Lake Field Office	E-mail or mail project updates, including GRSG LUPA/EIS update: The Draft LUPA/EIS is available for public comment. The comment period closes on January 29, 2014.	Pyramid Lake Paiute Tribe Washoe Greenville Rancheria Reno Sparks Indian Colony Honey Lake Maidu
February 2, 2014	BLM—Eagle Lake Field Office	E-mail project updates, including GRSG LUPA/EIS update: The USFWS has given the GRSG a status of “warranted but precluded,” which means that while it feels the bird is warranted for listing under the Endangered Species Act, there are other species that are of higher priority. One of the criteria in the listing decision was a lack of regulatory mechanisms in place to protect the bird. The BLM’s RMPs are the source of regulatory mechanisms for land management in each field office. In response to the USFWS decision, the BLM will be amending the RMPs throughout the entire range of the GRSG in order to provide more information to USFWS ahead of	Reno Sparks Indian Colony

**Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS**

Date	Federal Agency	Outreach	Tribes
		its listing schedule, which is proposed for the end of 2015. For northeast California, this means amendments of the Alturas, Eagle Lake, and Surprise RMPs. The BLM would plan on using the information currently contained in the RMPs and the GRSG strategy (such as Buffalo Skedaddle), combined with any new data collected in order to amend the RMPs. In the meantime, the BLM will follow the interim direction from the Washington Office.	
February 6, 2014	BLM—Alturas and Eagle Lake Field Offices	Face-to-face consultation, including GRSG LUPA/EIS updates: The draft was issued November 1, 2013, and the public comment period on the draft ended on January 29, 2014. The BLM is now reviewing approximately 17,000 comment letters. The Proposed LUPA/Final EIS is scheduled to come out in spring or summer of 2014.	Pit River Tribes
February 14, 2014	BLM—Winnemucca District	E-mail inviting the tribe to a government-to-government consultation meeting on the Draft LUPA/EIS. Invitation is in response to a tribal letter of February 10, 2014, requesting a consultation meeting.	Fort McDermitt Tribe
March 6, 2014	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS updates: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. Public comment for the draft amendment closed on January 29, 2014. The Proposed LUPA/Final EIS is expected to be out in September 2014.	Greenville Rancheria
March 8, 2014	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS updates.	Fort Bidwell Tribe
March 14, 2014	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS updates: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. The Proposed LUPA/Final EIS is expected to be out in September 2014.	Reno-Sparks Indian Colony
April 4, 2014	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS updates: The Proposed LUPA/Final EIS is expected to be signed in September 2014. The USFWS will make a decision by September 2015.	Susanville Indian Rancheria

**Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS**

Date	Federal Agency	Outreach	Tribes
April 4, 2014	BLM—Eagle Lake Field Office	Phone consultation, including GRSG LUPA/EIS update. The Proposed LUPA/Final EIS is expected to be signed in September 2014. Darrel asked if the Washoe Tribe had commented. I explained that I didn't know for sure since Bryan Hockett was the lead archaeologist on this project.	Washoe
April 8, 2014	BLM—Eagle Lake Field Office	E-mail project updates, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is expected to be signed in September 2014.	Washoe Greenville Rancheria Reno-Sparks Indian Colony
April 9, 2014	BLM—Eagle Lake Field Office	Mail project updates, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is expected to be signed in September 2014.	Honey Lake Maidu
April 12, 2014	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update.	Summit Lake Tribe
April 30, 2014	BLM—Eagle Lake Field Office	E-mail project updates, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is expected to be signed in September 2014.	Pyramid Lake Paiute Tribe
May 1, 2014	BLM—Alturas and Eagle Lake Field Offices	The draft LUPA/EIS was issued November 1, 2013, and the public comment period on the draft ended on January 29, 2014. The BLM is now reviewing approximately 17,000 comment letters. The Proposed LUPA/Final EIS is scheduled to come out in September 2014. In 2015, the USFWS will look at the conservation efforts of the BLM and will determine if the GRSG should be listed as a threatened or endangered species.	Pit River Tribe
May 2, 2014	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is expected to be signed in September 2014. The USFWS will make a decision by September 2015.	Pyramid Lake Paiute Tribe
June 27, 2014	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update. There were questions and comments regarding whether GRSG populations were in decline, especially around this area, and how predation by crows and coyotes contributed to the problem. It was noted how more livestock in the area attract	Cedarville Rancheria

**Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS**

Date	Federal Agency	Outreach	Tribes
		more coyotes, which can then lead to more predation on GRSG in the area.	
July 11, 2014	BLM—Alturas and Eagle Lake Field Offices	Face-to-face consultation, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is expected to be signed in March 2015. The USFWS will make a decision by September 2015. The greatest threats to GRSG in the area are fire, followed by invasive weeds (cheatgrass) and juniper encroachment.	Susanville Indian Rancheria
July 14, 2014	BLM—Alturas Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is expected to be signed in March 2015. The USFWS will make a decision by September 2015. The Klamath again stated that the GRSG taught Klamath Tribes how to dance.	Klamath Tribes
July 19, 2014	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update.	Summit Lake Tribe
July 23, 2014	BLM—Eagle Lake Field Office	E-mail project or mail updates, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is expected to be signed in November 2014.	Pyramid Lake Paiute Tribe Washoe Greenville Rancheria Reno-Sparks Indian Colony Honey Lake Maidu
July 25, 2014	BLM—Alturas and Eagle Lake Field Offices	Sent letter requesting information regarding tribal cultural resources, sensitive natural resources, resource access, or religious concerns relative to the proposed Plan Amendment. Government-to-government consultation with the tribe will be ongoing until the Land Use Plan Amendment is finalized and a record of decision is issued.	Pit River Tribe Pyramid Lake Paiute Tribe Washoe Greenville Rancheria Reno-Sparks Indian Colony Honey Lake Maidu Susanville Indian Rancheria
August 7, 2014	BLM—Alturas and Eagle Lake Field Offices	Face-to-face consultation, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is scheduled to come out in September 2014. In 2015 the USFWS will look at the BLM's conservation efforts and will determine if the GRSG should be listed as a threatened or endangered species.	Pit River Tribe

Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS

Date	Federal Agency	Outreach	Tribes
August 8, 2014	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update. A tribal member explained that around Barrel Springs there used to be plenty of GRSG and cattle and there is about the same amount of juniper today, so he believes that the decline in GRSGs is probably due to a road being put in. The road went through a lek, and traffic disturbs the grouse and other wildlife.	Fort Bidwell Tribe
October 3, 2014	BLM—Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. The Draft LUPA/EIS will be released on November 1, 2013, with a 90-day public comment period. A public meeting is scheduled for December 4, 2013, in Jensen Hall in Susanville. The draft alternatives contain many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining. The Proposed LUPA/Final EIS is expected to be out in June 2015. Handed out the GRSG newsletter.	Susanville Indian Rancheria
October 18, 2014	BLM—Surprise Field Office	Face-to-face consultation, including GRSG LUPA/EIS update.	Summit Lake Tribe
November 6, 2014	BLM—Eagle Lake Field Office	E-mail project updates, including GRSG LUPA/EIS update: The BLM has been working on draft alternatives for the GRSG LUPA/EIS. These alternatives are now out for internal review. Certain alternatives contain many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining."	Pyramid Lake Paiute Tribe Washoe Greenville Rancheria Reno-Sparks Indian Colony
November 11, 2014	BLM—Alturas and Eagle Lake Field Office	Face-to-face consultation, including GRSG LUPA/EIS update: The Proposed LUPA/Final EIS is scheduled to come out in June 2015. Later in 2015, the USFWS will look at the BLM's conservation efforts and determine if the GRSG should be listed as a threatened or endangered species.	Pit River Tribe

Table 6-2
Tribal Consultation and Outreach for the Nevada and Northeastern California Sub-region
Greater Sage-Grouse Proposed LUPA/Final EIS

Date	Federal Agency	Outreach	Tribes
December 2, 2014	BLM—Eagle Lake Field Office	Mail project updates, including GRSG LUPA/EIS update. The BLM has been working on draft alternatives for the GRSG LUPA/EIS. These alternatives are now out for internal review. Certain alternatives contain many new restrictions for development in GRSG-occupied habitat, particularly relating to new roads, transmission lines, wind and solar energy projects, and mining.	Honey Lake Maidu

The Proposed LUPA/Final EIS will be provided to the tribes concurrently with its release to the public.

6.2.2 California and Nevada State Historic Preservation Officer Consultation

On February 24, 2015 BLM contacted the NV State Historic Preservation Office (SHPO) to confirm that that NV SHPO did not wish to engage in formal consultation on the Nevada/Northeast California Greater Sage-Grouse LUPA/EIS because (1) the LUPA/EIS does not bring forward "Cultural Resources" for analysis because the ROD will not authorize any specific ground disturbing activities that may adversely affect historic properties; (2) the LUPA/EIS states that the implementation phase of the greater sage-grouse conservation effort will formally propose undertakings that will be subject to additional NEPA decisions and compliance with the Statewide BLM-SHPO Protocol Agreement dated December 22, 2014, and therefore formal SHPO involvement in this process will be during the implementation phase when historic properties may be adversely effected; and (3) the LUPA/EIS focuses on habitat and species preservation. NV SHPO responded on February 24, 2015 confirming that formal consultation is not necessary for the land use plan amendment (Palmer 2015).

The Draft LUPA/ EIS was sent to the California State Clearinghouse which disseminates NEPA documents to appropriate state agencies, however on May 13, 2015 BLM also contacted the California SHPO directly as follows:

“Per our phone conversation, this email is to seek your concurrence that CA SHPO does not wish to engage in formal consultation on the Nevada/Northeast California Greater Sage-Grouse EIS because (1) the EIS does not bring forward "Cultural Resources" for analysis because the ROD will not authorize any specific ground disturbing activities that may adversely affect historic properties; (2) the EIS states that the implementation phase of the greater sage-grouse conservation effort will formally propose undertakings that will be subject to

additional NEPA decisions and compliance with the Statewide BLM-SHPO Protocol Agreement dated February 2, 2014, (including the Supplemental Procedures for Sage Steppe Ecosystem Restoration), and therefore formal SHPO involvement in this process will be during the implementation phase when historic properties may be adversely effected; and (3) the EIS focuses on habitat and species preservation.

I would note for your reference that BLM California Applegate (formerly the Surprise and Alturas Field Offices) and Eagle Lake Field Offices have engaged in formal government-to-government consultation with tribes, pertaining to the sage-grouse EIS, since 2011. The tribes have expressed their concerns and provided comments about general sage grouse conservation through the consultation process and by submitting comments directly to the EIS, with some tribes participating as Cooperating Agencies. The EIS is noting, in general, that any conservation measures that preserve or enhance sage grouse habitat or numbers of birds would be beneficial to tribes continuing traditional activities related to the presence of sage grouse and other sagebrush dependent species.

I seek your concurrence via email response that we are in agreement.”

The Proposed LUPA/Final EIS will be provided to the California and Nevada State Historic Preservation Offices concurrently with its release to the public.

6.2.3 US Fish and Wildlife Service Consultation

To comply with Section 7(c) of the ESA, the BLM and Forest Service consulted with USFWS early in the planning process. USFWS provided input on planning issues, data collection and review, and alternatives development in their role as a cooperating agency.

Consultation with USFWS is required under Section 7(c) of the ESA prior to initiation of any project by the BLM and Forest Service that may affect any federally listed or endangered species or its habitat. This LUPA process is considered to be a major project, and the Proposed LUPA/Final EIS defines potential impacts on threatened and endangered species as a result of management actions proposed in the alternatives. The USFWS is a cooperating agency in this planning process, and USFWS staff has participated in interdisciplinary team meetings and has been provided drafts of the alternatives and analyses for discussion and input.

The BLM and Forest Service initiated informal consultation with a letter to the USFWS on October 25, 2013, and requested concurrence on which species would require consideration during consultation. Over the ensuing months, regular meetings and coordination efforts were held to identify the species that would be analyzed in the biological assessment, address which actions could affect those species, and determine whether the implementation of the Proposed Plan “may affect” the species for which this consultation occurred.

In May 2015, the biological assessment was formally submitted to the USFWS for review (see **Appendix W**, Joint BLM and Forest Service Biological Assessment/Biological Evaluation). The USFWS will evaluate the biological assessment and either concur with the determination via memorandum or prepare a biological opinion. The USFWS response to this consultation process (either the memorandum or the biological opinion) will be included in the RODs.

Outside of formal consultation, the BLM and Forest Service regularly met with the sub-regional USFWS representative during the Proposed LUPA/Final EIS phase to develop a proposed plan within the range of alternatives that would best meet GRSG habitat objectives and address public comments and concerns. The meetings with the USFWS representative often took place with biologists from the State of Nevada and the State of Nevada Sagebrush Ecosystem Technical Team. USFWS representatives attended meetings on the following dates:

- Nevada Sage Brush Ecosystem Science Advisory Team Meeting, December 5, 2013
- Interagency Coordination Meeting, February 6, 2014
- Interagency Coordination Meeting, March 6, 2014
- Interagency Coordination Meeting, March 27, 2014
- Interagency Coordination Meeting, April 7, 2014
- Interagency Coordination Meeting, April 21, 2014
- Population Trend Triggers Discussion, April 30, 2014
- Interagency Coordination Meeting, May 15, 2014
- Interagency Coordination Meeting, June 11, 2014
- BLM-Forest Service and USFWS Coordination, July 23, 2014
- NVCA GRSG EIS-Habitat Objectives Comparison Meeting, August 6, 2014
- Interagency Coordination Meeting, September 24, 2014
- Interagency Coordination Meeting, November 19, 2014
- Interagency Coordination Meeting, December 8, 2014
- Interagency Coordination Meeting, March 16, 2015

6.3 COOPERATING AGENCIES/ENTITIES

A cooperating agency/entity is any federal, state, or local government agency or Native American tribe that enters into a formal agreement with a lead federal agency to help develop an environmental analysis. More specifically, cooperating agencies/entities “work with the BLM, sharing knowledge and resources, to

achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM Land Use Planning Handbook H-1601-1). A federal agency, state agency, local government, or Tribal government may qualify as a cooperating agency/entity because of “jurisdiction by law or special expertise” (40 CFR 1501.6 and 1508.5).

On December 7, 2011, the BLM wrote to 52 local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies/entities for the Nevada and Northeastern California Greater Sage-Grouse Sub-region LUPA/EIS. Twenty-four agencies/entities agreed to participate on the LUPA/EIS as designated cooperating agencies/entities, all of which have signed Memoranda of Understanding (MOUs) with the BLM (**Table 6-3**). Some agencies/entities are participating as cooperating agencies/entities under the larger umbrella of the national-level MOUs described below.

Table 6-3
Cooperating Agencies/Entities

Agencies and Tribes Invited to be Cooperators	Agencies/Entities that Accepted	Agencies/Entities that Signed MOUs
Counties		
Churchill County	X	X
County of Carson City		
Douglas County		
Elko County	X	X
Esmeralda County		
Eureka County	X	X
Humboldt County	X	X
Lander County	X	X
Lassen County	X	X
Lincoln County	X	X
Lyon County		
Mineral County		
Modoc County	X	X
Nye County	X	X
Pershing County	X	X
Storey County	X	X
Washoe County	X	X
White Pine County	X	X
State Agencies		
Nevada Department of Agriculture		
Nevada Division of Minerals	X	
Nevada Department of Transportation	X	X
Nevada Department of Wildlife	X	X
Nevada Department of Conservation and Natural Resources	X	X
Office of the Governor - Nevada	N/A	

**Table 6-3
Cooperating Agencies/Entities**

Agencies and Tribes Invited to be Cooperators	Agencies/Entities that Accepted	Agencies/Entities that Signed MOUs
Federal Agencies		
Department of Defense Fallon Naval Air Station	X	
Department of Defense Nellis Air Force Base	X	
Federal Highway Planning Administration - Nevada	X	X
Natural Resources Conservation Service	X	X
US Fish and Wildlife Service	X	X
US Forest Service	X	X
Tribes		
Alturas Rancheria		
Battle Mountain Band		
Cedarville Rancheria		
Confederated Tribes of Goshute		
Duck Valley Shoshone-Paiute Tribe		
Duckwater Shoshone Tribe	X	
Elko Band		
Ely Shoshone Tribe		
Fallon Paiute Shoshone Tribe	X	
Fort Bidwell Reservation		
Fort McDermitt Paiute-Shoshone Tribe	X	
Goshute Tribe		
Greenville Rancheria		
Hanylekim Maidu		
Hungry Valley Community		
Ibapah Goshute Tribe	X	
Klamath Tribes		
Lovelock Indian Colony		
Pit River Tribe of California		
Pyramid Lake Paiute Tribe	X	X
Reno-Sparks Indian Colony		
South Fork Band		
Summit Lake Paiute Tribe	X	X
Susanville Indian Rancheria	X	X
Te-Moak Tribe of Western Shoshone		
Walker River Paiute Tribe	X	
Washoe Tribe	X	X
Wells Band		
Winnemucca Colony Council		
Yerington Paiute Tribe		
Yomba Shoshone Tribe	X	
Other		
Nevada Mining Association	N/A	
Nevada National Association of Counties		

The Forest Service and USFWS are participating in the LUPA/EIS process as cooperating agencies at a national level, and both agencies have signed MOUs at a national level.

Since starting on May 18, 2012, the BLM has conducted eight meetings with cooperating agencies/entities. Cooperating agencies/entities were also encouraged to attend the scoping open houses and provide comments during the scoping period (**Section 6.4.1**, Scoping Process). These agencies/entities have been engaged throughout the planning process, including during alternatives development.

During the Proposed LUPA/Final EIS development phase the cooperating agencies/entities were asked to provide input on the following documents:

- Draft Proposed Plan Amendment (DPPA), June 2, 2014
- Preliminary Draft of the Proposed LUPA/Final EIS, May 2015

6.4 COORDINATION AND CONSISTENCY

The BLM's planning regulations require that RMPs be "consistent with officially approved or adopted resource-related plans, and the policies and procedures contained therein, of other federal agencies, state and local governments, and Indian tribes, so long as the guidance and RMPs also are consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands" (43 CFR 1610.3-2(a)). The general requirement in FLPMA/planning regulations is to coordinate the LUP process with LUPs of other agencies, states, and local governments to the extent consistent with law (see FLPMA s. 202(c)(9) and 1610.3-1(a)); and the respective duties to be consistent with both officially approved or adopted plans. or duties res: non-official/non-approved plans (to the extent those plans are consistent w/ federal law, or to maximum extent practical) (see 1610.3-2(a)(b)). In accordance with FLPMA, the BLM kept apprised of and gave consideration to state, local, and tribal land use plans, assisted in resolving any inconsistencies, and provided meaningful public involvement of the Proposed LUPA/Final EIS.

As part of preparing the Draft LUPA/EIS, the BLM requested the state, county, and tribal government cooperating agencies review the range of alternatives and identify potential inconsistencies between the alternatives and each agency's applicable plans. This allowed the state, local, and tribal cooperating agencies to apply their special expertise regarding the familiarity with their own plans. The BLM's planning regulations also note that the BLM "shall identify any known inconsistencies with State or local plans, policies or programs" (43 CFR 1610.3-2(e)) when submitting a proposed plan amendment for the Governor's consistency review. This section identifies known inconsistencies between federal, state, local, and tribal plans and policies, using the previous county evaluations, comments provided during the public review period for the Draft LUPA/EIS, and agency evaluation of "officially approved or adopted resource

related plans” (43 CFR 1610.3-2 (a) and (b)). In instances where state and local plans, policies, or programs may differ, the BLM has disclosed both instances of inconsistency, but would defer to those of the state, per 43 CFR 1610.302(d).

The BLM is aware that there are specific state laws and local plans relevant to aspects of public land management that are discrete from, and independent of, federal law. However, BLM is bound by federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA and its implementing regulations require that BLM's land use plans be consistent with officially-approved state and local plans only if those plans are consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands. Where officially-approved state and local plans or policies and programs conflict with the purposes, policies, and programs of federal law applicable to public lands, there will be an inconsistency that cannot be resolved. With respect to officially-approved state and local policies and programs (as opposed to plans), this consistency provision only applies to the maximum extent practical. While county and federal planning processes, under FLPMA, are required to as integrated and consistent as practical, the federal agency planning process is not bound by or subject to state or county plans, planning processes, policies, or planning stipulations.

The following subheadings group the identification of known inconsistencies with the Proposed Plan by the type of agency (i.e., federal, state, local, and tribal). It is important to note that the identification of inconsistencies at this point in the planning process notifies state, local, and tribal governments of known inconsistencies. The absence of some inconsistencies could reflect either consistent management or an inconsistency that the agency has not specifically identified, per regulatory requirements. The formal consistency review period will allow agencies the opportunity to identify additional information, as applicable.

Consistency requirements are only applicable on BLM-administered lands. Consistency with state and local plans where there are no BLM-administered lands in the planning area is not addressed. In these instances consistency, as described above, is not required. However, cooperation regarding the agencies' applicable special expertise or jurisdiction by law has occurred.

6.4.1 Inconsistencies with State Plans, Policies, and Procedures

The State of Nevada finalized the *2014 Nevada Greater Sage-grouse Conservation Plan Sagebrush Ecosystem Program State of Nevada* in October 1, 2014. They designed their plan to “eliminate the threats facing [GRSG] while balancing the economic and social needs of the residents of Nevada through the use of ‘avoid, minimize and mitigate’ with additional offsite mitigation being accomplished by the use of the Nevada Conservation Credit System” (See **Appendix L**). There are many aspects of the State's plan and the BLM's Proposed Plan that are

conceptually consistent, though each plan uses different wording. Alternative E in **Chapter 2** is based on the State's plan.

There are aspects of the State's plan that are out of the BLM's jurisdiction, such as the recommendation for management dealing with predator control and hunting. However, they are not identified as inconsistencies because the BLM does not permit hunting or predator control. Inconsistencies will be limited to areas where the State's plan provides management direction for uses/areas for which the BLM has jurisdiction.

Known inconsistencies between the BLM's Proposed Plan and the Conservation Plan for Greater Sage-Grouse in Nevada include the following:

- The State of Nevada does not identify specific resource allocations, such as open or closed for mineral materials or exclusion, avoidance, or open for ROWs. Rather the State of Nevada's plan applies the concept of 'Avoid, Minimize, Mitigate' to reduce the threat of anthropogenic disturbances. The BLM Proposed Plan does identify specific allocations for each appropriate resource as a "regulatory mechanism" to reduce the threats to GRSG.
- The BLM's Proposed Plan identifies SFAs. Management of SFAs includes prioritization actions and recommends withdrawing these areas from mineral location and removing the two exceptions for the fluid mineral leasing NSO stipulation, compared with PHMA. There is nothing similar to this action in the State's plan.

6.4.2 Inconsistencies with County Plans, Policies, and Procedures

In their consistency evaluation of the range of alternatives for the Draft LUPA/EIS and in subsequent comments on the public review Draft LUPA/EIS, several counties, including Elko, Eureka, Lander, and Pershing in Nevada, emphasized a desire to preserve existing private property rights. Comments also noted that Alternatives B, C, D, and F from the Draft LUPA/EIS are inconsistent with county plans, primarily because they would restrict resource uses such as minerals and infrastructure development and would introduce the potential for road or grazing closures. The Proposed LUPA/Final EIS discloses that the preservation of valid existing rights is a planning criterion and all the programs acknowledge those rights. Several alternatives in the Proposed LUPA/Final EIS propose management to reduce disturbance from mineral and infrastructure development. While those actions would preserve valid existing rights, future development would likely be affected. Reductions in such development potential are generally inconsistent with the aforementioned county plans. However, the counties' plans may not be consistent with the BLM's National GRSG Strategy, for which this Proposed LUPA is being developed, in compliance with FLPMA.

Counties with adopted county land use plans identified additional inconsistencies with the BLM's alternatives that were more procedural in nature. At least three counties have land use planning documents that require all federal actions comply with local law. The Proposed Plan is inconsistent with these local county policies.

6.4.3 Inconsistencies with Tribal Plans, Policies, and Procedures

The Summit Lake Paiute Tribe did not specifically identify a plan related to GRSG management. However, they did acknowledge that Alternative D, the BLM's preferred alternative from the Draft LUPA/EIS, could limit their ability to continue to provide electrical power to the reservation by requiring burying of overhead lines during permit renewal. The need to provide electric power to the reservation is assumed to be a key element of the strategy for economic sustainability for the Summit Lake Paiute Tribe. The BLM Proposed Plan was revised from the BLM Preferred Alternative to not have the requirement to bury existing powerlines as a requirement in the permit renewal process

The Summit Lake Paiute Tribe noted that they are pursuing several land acquisition initiatives to expand the reservation boundaries radiating from the reservation boundary out a distance of 25 miles to protect the biodiversity of species endemic to the Summit Lake watershed and surrounding area, including GRSG. They requested the BLM Proposed Plan be revised to support the tribe's initiative to acquire public lands. The tribe's initiative to acquire additional federal lands that are identified as PHMA or GHMA would be inconsistent with the BLM Proposed Plan direction to retain GRSG habitat, unless the tribe's action could be demonstrated to result in a net conservation gain for GRSG and its habitat.

6.5 RESOURCE ADVISORY COUNCILS

Resource Advisory Councils (RACs) are citizen-based groups that provide an opportunity for individuals from all backgrounds and interests to have a voice in the management of public lands, and to help improve their health and productivity. RAC recommendations address all public land issues, including land use planning, recreation, noxious weeds, and wild horse and burro herd management areas. Nevada has three RACs in the Nevada and northeastern California Greater Sage-Grouse Planning Area: the Mojave-Southern Great Basin, the Sierra Front-Northwestern Great Basin, and the Northeastern Great Basin. California has one RAC in the Nevada and northeastern California Greater Sage-Grouse Planning Area: the newly developed Northern California RAC. The BLM and Forest Service presented status updates at the following RAC meetings from 2011 through the present day:

- BLM Nevada Tri-RAC meeting, January 26-27, 2012
- Northeastern Great Basin RAC meeting, April 19, 2012
- BLM Nevada Tri-RAC meeting, January 31-February 1, 2013

- Sierra Front-Northwestern Great Basin RAC meeting, April 4-5, 2013
- Northeastern Great Basin RAC meeting, June 27, 2013
- Northeastern Great Basin RAC meeting, September 12, 2013
- Northeast California RAC Subcommittee on Sage Grouse, November 12, 2013
- Northeast California RAC meeting, December 4, 2013
- Sierra Front-Northwestern Great Basin RAC Sage grouse subgroup meeting, January 10, 2014
- BLM Nevada Tri-RAC meeting, February 6-7, 2014
- Northeastern Great Basin RAC meeting, May 15, 2014
- BLM Nevada Tri-RAC meeting, February 26-27, 2015

6.6 PUBLIC INVOLVEMENT

Public involvement is a vital component of both the LUPA and EIS processes. Public involvement vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR Part 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in the NEPA process. Section 202 of the FLPMA directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on BLM-administered lands. These procedures can be found in the BLM's *Land Use Planning Handbook* (H-1601-1; BLM 2005a). Public involvement for the Nevada and Northeastern California Greater Sage-Grouse Sub-region LUPA/EIS includes the following:

- Public scoping before beginning NEPA analysis to determine the scope of issues and alternatives to be addressed in the LUPA/EIS
- Public outreach via newsletters and press releases throughout the LUPA/EIS process
- Collaboration with federal, state, local, and tribal governments and cooperating agencies throughout the LUPA/EIS process
- Public review and comment on the Draft LUPA/EIS
- Public review and comment on the Proposed LUPA/Final EIS

Between July 2011 and April 2014, 19 press releases related to GRSG were issued. They covered a variety of topics, including policy, deferral of parcels in oil and gas lease sales, comment periods, and public workshop announcements. In addition, periodic updates were scheduled in 2014 to keep the public up-to-date on the preparation of the Proposed LUPA/ Final EIS and were posted to the website.

Efforts were also made to promote GRSG meetings and comment periods and to educate people about general GRSG facts using social media, including a project website:

http://www.blm.gov/nv/st/en/prog/wildlife/greater_sage-grouse.html

6.6.1 Scoping Process

The formal public scoping process for the Nevada and Northeastern California Greater Sage-Grouse Sub-region LUPA/EIS began on December 9, 2011, with the publication of the notice of intent in the Federal Register (*76 Federal Register 77008-77011*). The notice of intent notified the public of the BLM's intent to prepare EISs and supplemental EISs to incorporate GRSG conservation measures into LUPs; it also initiated the public scoping period. A notice of correction to the notice of intent was released on February 10, 2012 (*77 Federal Register 7178-7179*). The notice of correction extended the scoping period until March 23, 2012.

Project Websites

The BLM launched a national GRSG conservation website as part of its efforts to maintain and restore GRSG habitat on public lands. The national website is available on the Internet at <http://www.blm.gov/wo/st/en/prog/more/sagegrouse.html>. The BLM also hosts a Great Basin regional website: <http://www.blm.gov/wo/st/en/prog/more/sagegrouse/western.html>. These sites are regularly updated to provide the public with the latest information about the planning process. The Great Basin website provides background information about the project, a public involvement timeline, maps of the planning areas, and copies of public information documents and the notice of intent. The dates and locations of scoping open houses were also announced on the Great Basin website.

Press Release

A press release was made available on the national and Great Basin region websites on December 8, 2011, announcing the scoping period for the LUPA/EIS process. The Nevada and California BLM State Offices also distributed press releases on January 4, 2012, announcing the scoping period for the LUPA/EIS process. The press releases provided information on the scoping open houses being held and described the various methods for submitting comments. A second press release was posted on the national and Great Basin websites on February 7, 2012, announcing the extension of the public scoping period to March 23, 2012. A third press release was issued on the national and Great Basin websites on February 9, 2012, announcing the addition of National Forests to the GRSG planning efforts.

Public Scoping Open Houses

The BLM hosted seven open houses to provide the public with an opportunity to become involved, learn about the project and the planning process, meet the planning team members, and offer comments. The open house was advertised

via press release and the Great Basin website. The scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with the BLM and other agency staff representatives. The locations and dates of the open houses were as follows:

- Tonopah, Nevada – January 9, 2012
- Ely, Nevada – January 10, 2012
- Elko, Nevada – January 11, 2012
- Winnemucca, Nevada – January 12, 2012
- Alturas, CA – January 18, 2012
- Susanville, CA – January 19, 2012
- Reno, Nevada – January 30, 2012

Scoping Comments Received

Detailed information about the comments received can be found in the *National Greater Sage-Grouse Planning Strategy Scoping Summary Report*, finalized in May 2012 (BLM 2012b). A total of 585 unique written submissions were received for the Great Basin region. Of these, 428 were specific to California and Nevada. The issues identified during public scoping and outreach are described in **Section 1.5.2**, Issues Identified for Consideration in the Nevada and Northeastern California Sub-Region Greater Sage-Grouse LUP Amendments, of this LUPA/EIS. These issues guided the development of alternative management strategies outlined in **Chapter 2** of this LUPA/EIS.

6.6.2 Public Comment on the Draft LUPA/EIS

Public Meetings

A Notice of Availability (NOA) for the Draft LUPA/EIS was published in the Federal Register on November 1, 2013. The NOA initiated a 90-day public comment period, which ended on January 29, 2014. The BLM and Forest Service notified the public of open house meetings via the project website and a news release to 33 media sites, including newspapers, radio, and television.

The BLM and Forest Service held seven public comment open houses for the Draft LUPA/EIS from December 3–December 12, 2013:

- Cedarville, California – December 3, 2013
- Susanville, California – December 4, 2013
- Reno, Nevada – December 5, 2013
- Tonopah, Nevada – December 9, 2013
- Ely, Nevada – December 10, 2013
- Elko, Nevada – December 11, 2013

- Winnemucca, Nevada – December 12, 2013

All meetings were held from 5:30 to 7:30 pm. The goal of the open houses was to inform the public about the Draft LUPA/EIS and to obtain further public input on the alternatives that were developed and analyzed. In addition, the BLM and Forest Service sought comments on potential impacts resulting from the six alternatives. At the open houses, displays introduced the various resource topics and presented the six alternatives for the resource topics. Other displays explained the NEPA process and the methods for submitting comments. A slide show looped throughout the open house describing the Nevada and Northeastern California Sub-region Greater Sage-Grouse Draft LUPA/EIS preparation process.

Public comments were solicited at the open houses, where comment sheets were provided.

Comment Analysis Methodology

During the 90-day public comment period to receive comments on the Draft LUPA/EIS, the BLM and Forest Service received written comments by mail, email, and submissions at the public meetings. Comments covered a wide spectrum of thoughts, opinions, ideas, and concerns. The BLM and Forest Service recognize that commenters invested considerable time and effort to submit comments on the Draft LUPA/EIS and developed a comment analysis methodology to ensure that all comments were considered as directed by NEPA regulations.

According to NEPA, the BLM and Forest Service are required to identify and formally respond to all substantive public comments. The BLM and Forest Service developed a systematic process for responding to comments to ensure all substantive comments were tracked and considered. Upon receipt, each comment letter was assigned an identification number and logged into CommentWorks, a Web-based database that allowed the BLM and Forest Service to organize, categorize, and respond to comments. Substantive comments from each letter were coded to appropriate categories based on content of the comment, retaining the link to the commenter. The categories generally follow the sections presented in the Draft LUPA/EIS, though some relate to the planning process or editorial concerns.

Comments similar to each other were grouped under a topic heading, and the BLM and Forest Service drafted a statement summarizing the ideas contained in the comments. The responses were crafted to respond to the comments; a response indicates whether or not the commenters' points resulted in a change in the document. As a result of public comments, changes were made to the Draft LUPA/EIS and reflect consideration given to public comments. A summary of major changes between the Draft LUPA/EIS and the Proposed LUPA/Final EIS can be found in **Section 1.8**, Changes between the Draft LUPA/EIS and the

Proposed LUPA/Final EIS, in **Chapter I** and the text boxes at the top of **Chapters I** through **5**.

Although each comment letter was diligently considered, the comment analysis process involved determining whether a comment was substantive or nonsubstantive in nature. In performing this analysis, the BLM and Forest Service relied on the CEQ's regulations to determine what constituted a substantive comment.

A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information and/or analysis in the EIS
- Questions, with a reasonable basis, the adequacy of the information and/or analysis in the EIS
- Presents reasonable alternatives other than those presented in the Draft EIS that meet the purpose and need of the proposed action and address significant issues
- Questions, with a reasonable basis, the merits of an alternative or alternatives
- Causes changes in or revisions to the proposed action
- Questions, with a reasonable basis, the adequacy of the planning process itself

Additionally, BLM's NEPA handbook identifies the following types of substantive comments:

- Comments on the Adequacy of the Analysis: Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are substantive in nature but may or may not lead to changes in the Final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the manager responsible for preparing the EIS (the Authorized Officer) does not think that a change is warranted, the response should provide the rationale for that conclusion.
- Comments That Identify New Impacts, Alternatives, or Mitigation Measures: Public comments on a Draft EIS that identify impacts, alternatives, or mitigation measures that were not addressed in the draft are substantive. This type of comment requires the Authorized Officer to determine whether it warrants further consideration. If it

does, the Authorized Officer must determine whether the new impacts, new alternatives, or new mitigation measures should be analyzed in the Final EIS, a supplement to the Draft EIS, or a completely revised and recirculated Draft EIS.

- Disagreements with Significance Determinations: Comments that directly or indirectly question, with a reasonable basis, determinations regarding the significance or severity of impacts are substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the Authorized Officer does not think that a change is warranted, the response should provide the rationale for that conclusion.

Some submissions received contained substantive comments, but were out of the scope of this project. These included comments on subjects not related to this effort, other GRSG efforts, or BLM or Forest Service laws, rules, regulations, or policy. These comments were reviewed and sent along to the appropriate party as needed, but are not included in the comment response for this effort.

Comments that failed to meet the above description were considered nonsubstantive. Many comments received throughout the process expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft LUPA/EIS, or represented commentary regarding resource management without any real connection to the document being reviewed. These comments did not provide specific information to assist the planning team in making a change to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the Draft LUPA/EIS, and are not addressed further in this document.

Opinions, feelings, and preferences for one element or one alternative over another, and comments of a personal and/or philosophical nature were all read, analyzed, and considered, but because such comments are not substantive in nature, the BLM and Forest Service did not respond to them. It is also important to note that, while all comments were reviewed and considered, comments were not counted as “votes.” The NEPA public comment period is neither considered an election nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

Comments citing editorial changes to the document were reviewed and incorporated.

Public Comments

A total of 371 unique comment letters, forms, and emails were received during the 90-day public comment period. These documents resulted in 1,948

substantive comments. Out of the 371 comment letters, 204 were submitted by private individuals (55.0 percent); 60 by organizations, including businesses and environmental and wildlife protection groups (16.2 percent); 75 by associations, including user groups, recreational clubs, realty associations, industry groups, and partnerships (20.2 percent); 5 by federal agencies (1.3 percent); 8 by state governments (2.2 percent); 13 by local governments (3.5 percent); 3 by tribal governments (0.8 percent); and 3 letters were submitted anonymously (0.8 percent). The BLM and Forest Service parsed 1,948 substantive comments from the 371 submissions. Private individuals submitted 213 of these comments (10.9 percent), 560 were submitted by organizations (28.7 percent), 749 were submitted by associations (38.4 percent), 29 were submitted by federal agencies (1.5 percent), 9 were submitted by state agencies (0.5 percent), 289 were submitted by local governments (14.8 percent), 11 were submitted by tribal governments (0.6 percent), and 3 substantive comments came from anonymous submission (0.2 percent, see **Table 6-4**).

Table 6-4
Number of Unique Submissions and Comments by Affiliation

Group	Number of Submissions	Number of Comments
Private individuals	204	213
Organizations (including businesses and environmental and wildlife protection groups)	60	560
Associations (user groups, recreational clubs, realty associations, industry groups, partnerships, etc.)	75	749
Federal agencies (EPA, USFWS, USFS, NPS)	5	29
State government (state agencies, Governor's Office)	8	9
Local government (county commissions and departments)	13	289
Tribal government	3	11
Anonymous	3	3
Total	371	1,948

In addition to the unique submissions discussed above, 16,520 form letters were submitted during the public comment period. Form letters are exact or very close copies of a letter that are submitted multiple times by different individuals; individuals may add additional language to the letter, but this usually does not substantially change the content of the letter. Often, form letters are created by an organization and sent to their members, who in turn submit this letter to the planning effort. For the Nevada and Northeastern California Draft LUPA/EIS, 7 different form letter masters were submitted: 2,910 letters from WildEarth Guardians; 8,920 letters from the American Wild Horses Preservation Campaign; 2,510 letters from the American Bird Conservancy; 2,130 letters from Defenders of Wildlife; 30 letters from the Nevada Rural Electric Association; 10 letters from local ranchers; and 10 letters from Harney Electric Cooperative. One copy of each of these letters was included in the comment analysis process as a master form letter. All of the form letters were reviewed

for additional substantive content; this was included in the comment analysis process when present.

A review of the 1,948 substantive comments received revealed a high level of interest about the management of GRSG (369 comments, 18.9 percent), compliance with NEPA, FLPMA, and other laws (NEPA: 289 comments, 14.8 percent; other laws: 75 comments, 3.9 percent; and FLPMA: 74 comments, 3.8 percent), livestock grazing (237 comments, 12.1 percent), socioeconomics (142 comments, 7.3 percent), and sagebrush vegetation (87 comments, 4.5 percent). Other topics with high levels of interest were mineral development (locatable minerals: 59 comments, 3.0 percent; leasable minerals: 55 comments, 2.8 percent; and salable minerals: 4 comments, 0.2 percent), predation of GRSG (58 comments, 3.0 percent), lands and realty (54 comments, 2.8 percent), and fire and fuels (49 comments, 2.5 percent). Topics that received moderate interest were wild horses and burros (34 comments, 1.7 percent), travel management (30 comments, 1.5 percent), and riparian vegetation and water resources (25 comments, 1.3 percent each). The topics with the least amount of interest were recreation (13 comments, 0.7 percent), climate change (12 comments, 0.6 percent), noise and tribal interests (11 comments, 0.6 percent), fish and wildlife (8 comments, 0.4 percent each), lands with wilderness characteristics (8 comments, 0.4 percent each), soil resources (7 comments, 0.4 percent), and ACECs (5 comments, 0.3 percent). In addition to these topics, comments were collected that suggested editorial changes (138 comments, 7.1 percent), were substantive comments but considered out of scope of this document (63 comments, 3.2 percent), and requested an extension of the comment period (6 comments, 0.3 percent). These comments were reviewed and considered but not included in the formal comment responses effort. See **Table 6-5**.

Table 6-5
Number of Comments on the Draft LUPA/EIS by
Category

Topic	Number of Comments
Greater Sage-Grouse	369
NEPA	289
Livestock grazing	237
Socioeconomics	142
Vegetation – sagebrush	87
Other Laws	75
FLPMA	74
Locatable minerals	59
Predation	58
Leasable minerals	55
Lands and realty	54
Fire and fuels	49

Table 6-5
Number of Comments on the Draft LUPA/EIS by
Category

Topic	Number of Comments
Wild horses and burros	34
Travel management	30
Vegetation – riparian	25
Water resources	25
Recreation	13
Climate change	12
Noise	11
Tribal interests	11
Fish and wildlife	8
Lands with wilderness characteristics	8
Soil resources	7
ACECs	5
Salable minerals	4
Edits*	138
Out of scope*	63
Extension requests*	6
Total	1,948

*Comments in these categories were reviewed for their content but not included in the comment response effort.

The comments received on the Draft LUPA/EIS were similar to the issues raised during public scoping. In many cases, comments expressed a desire for very specific implementation-level (project-level) details to be included in the LUPA. As described in **Chapters 1** and **2**, the LUPA/EIS provides general guidance and identifies allowable uses and allocations but is not meant to address all details about individual projects. A separate environmental review will be conducted for specific projects at the implementation level to address these details. Some comments spanned several topical areas and included a discussion about a resource use or activity and listed concerns about the resources that would be impacted by the use, or conversely, the impact that restrictions would have on resource uses or activities.

All substantive comments, detailed summaries, and responses organized by resource, resource use, or LUPA/EIS planning regulation can be found in **Appendix C**. An overview of these summaries and responses can be found below in **Table 6-6**. Comments related to editorial changes, out of scope topics, extension requests, and nonsubstantive comments were not included in the comment response effort.

**Table 6-6
Overview of Comments by Category**

Topic	Overview
ACECs	Commenters requested that the data required for an ACEC designation be discussed, recommended certain areas for ACEC designation, and wanted to see a greater range of alternatives for ACEC locations.
Climate change	Commenters wanted to see a more thorough and rigorous analysis of climate change and its potential impacts on the planning area, a more complete definition of drought, and clarification on related management actions.
Fire and fuels	Commenters requested clarification on the potential impacts of the plan on fire conditions, suggested potential changes to alternatives or management actions, and provided additional references.
Fish and wildlife	Commenters noted that there may be impacts on other fish and wildlife species, including special status species, if the project area is managed solely for GRSG habitat.
FLPMA	Commenters claimed that the Draft LUPA/EIS failed to comply with the multiple use mandate required under FLPMA and the Multiple Use Sustained Yield Act required under the Forest Service. They also noted that the plan is not consistent with state, local, and tribal plans and policies, and that there needs to be a consistency review with local plans in the document.
Greater Sage-Grouse	Commenters claimed the NTT report was inadequate to use as a primary source in the plan, found the plan to be inconsistent with COT conservation objectives, requested clarification on the range of alternatives and habitat mapping, suggested additional literature to be used for best available information on GRSG, made recommendations on how to improve the impact analysis of various resources on GRSG, found the cumulative impacts to be deficient, and requested clarification or revisions to mitigation measures.
Lands and realty	Commenters requested clarification on or recommended specific changes to proposed management, recommended additional references related to infrastructure and changes in land use, found the analysis of impacts between lands and realty management and renewable energy infrastructure to be lacking, recommended additional projects for consideration under cumulative impacts, and considered Appendix A of the Draft LUPA/EIS to be inadequate.
Lands with wilderness characteristics	Commenters wanted additional lands with wilderness characteristics to be considered for the protection of GRSG and requested that these lands be analyzed more thoroughly.
Leasable minerals	Commenters wanted certain aspects of the alternatives clarified, such as reclamation vs. restoration, the NSO buffer, and how the disturbance cap would be applied. Commenters also recommended additional literature, wanted a more complete analysis of impacts and cumulative impacts, and voiced concerns over off-site mitigation,
Livestock grazing	Commenters recommended expanding the range of alternatives for livestock grazing, argued that retiring grazing permits requires Congressional action, requested clarification on certain grazing terms and management actions, found the analysis of impacts to be inadequate, requested additional items be added to the cumulative impacts section, and recommended additional mitigation measures.

**Table 6-6
Overview of Comments by Category**

Topic	Overview
Locatable minerals	Commenters suggested that additional management actions be included related to mitigation measures and withdrawals, noted that a thorough discussion of geology is missing from the document, found baseline data on disturbance to be incorrect, claimed that the alternatives were not compliant with current mining laws, and requested clarification on specific mining-related terms.
NEPA	Commenters asserted that the plan does not comply with the requirements of NEPA, did not adequately notify the public about the Draft LUPA/EIS, did not coordinate with local agencies, did not provide a wide enough range of alternatives, did not use the best available data, and have not provided adequate cumulative impacts analysis or mitigation measures.
Noise	Commenters questioned current studies used regarding low-frequency noise and wanted to see additional information used to determine the impacts of noise on different parts of the GRSG life cycle.
Other Laws	Commenters argued that the plan does not comply with other federal laws.
Predation	Commenters questioned why the BLM and Forest Service did not include the threat of predation in the Draft LUPA/EIS.
Recreation	Commenters recommended using seasonal closures, requested additional literature on the impacts of recreation on GRSG, wanted more language on the impacts of hunting on GRSG populations, and requested clarification on recreation management actions.
Salable minerals	Commenters requested specific changes to management actions and exemption language.
Socioeconomics	Commenters wanted the baseline data revised to include more current and relevant data, claimed the analysis used was at the wrong scale to make the information meaningful, and noted that the impacts analysis was inadequate in many ways.
Soil resources	Commenters recommended adding a section on geology or mineral resources, as well as recommended new references for the impacts of livestock grazing on biological soil crust.
Travel management	Commenters recommended different routes that should be closed, restricted, or kept open; recommended new references, including travel management plans already in place in BLM field offices; and recommended mitigation measures to help prevent the spread of invasive species.
Tribal interests	Commenters requested continued government-to-government consultation with the tribes in the planning area, that tribal plans and projects be included in the document, and that the BLM and Forest Service provide a better impacts analysis on the economy of local tribes.
Vegetation – riparian	Commenters noted that the BLM and Forest Service should apply adaptive management to riparian areas, disagreed with some of the metrics chosen to determine habitat objectives, and requested additional information be used in the baseline information and for impacts analysis.
Vegetation – sagebrush	Commenters voiced concern about pinyon-juniper expansion and the spread of invasive species into sagebrush ecosystems; requested additional information be provided to support reference sites, VDDT modeling, and

**Table 6-6
Overview of Comments by Category**

Topic	Overview
	utilization levels; and wanted to see a mitigation and monitoring program that increased overall sagebrush health.
Water resources	Commenters requested additional baseline information on 303(d) listed streams, a more comprehensive analysis of impacts from mineral development on water resources, and clarification of how existing drought management guidelines and requirements would be incorporated into the plan.
Wild horses and burros	Commenters noted that WHBs were not adequately protected, that forage for livestock and WHBs should not be combined, that the impacts analysis was insufficient, and that the National Academy of Sciences' 2013 recommendations should be incorporated into the plan.

Complete responses, including rationale and any associated changes made in the Proposed LUPA/Final EIS, can be found in **Appendix C**.

6.6.3 Future Public Involvement

Public participation efforts will be ongoing throughout the remainder of the LUPA/EIS process.

An NOA will be published in the Federal Register to notify the public of the availability of the Proposed LUPA/Final EIS. The NOA will also outline protest procedures during the 30-calendar-day protest period. Concurrent with the first 30 days of the protest period, a 60-day joint governor's consistency review (one for California and one for Nevada) will be implemented. The Proposed LUPA/Final EIS will be available for downloading from the project website at: http://www.blm.gov/nv/st/en/prog/wildlife/greater_sage-grouse.html. The Proposed LUPA/Final EIS will also be available for review at the BLM Nevada and California State Offices along with the Humboldt-Toiyabe Forest Ranger Districts. Press releases will be issued to notify the public of the Proposed LUPA/Final EIS availability. All recipients of the Draft LUPA/EIS and all parties who submitted written comments on the Draft LUPA/EIS will receive the Proposed LUPA/Final EIS in either a hard copy or CD form, or they will be able to download it from the project website. The BLM and Forest Service will notify those who previously received the Draft LUPA/EIS electronically. The BLM Nevada State Office maintains the distribution list for the Proposed LUPA/Final EIS, which is available on request.

Records of Decision will be issued by the BLM and the Forest Service after the release of the Proposed LUPA/Final EIS, the Governor's Consistency Review, and any resolution of protests received on the Proposed LUPA/Final EIS.

6.7 LIST OF PREPARERS

This LUPA/EIS was prepared by an interdisciplinary team of staff from the BLM, Forest Service, and Environmental Management and Planning Solutions, Inc. (see

Table 6-7). In addition, staff from numerous federal, state, and local agencies and nonprofit organizations contributed to developing the LUPA/EIS.

The following is a list of people that prepared or contributed to the development of the LUPA/EIS.

**Table 6-7
List of Preparers**

Name	Role/Responsibility
BLM-Nevada	
Nevada State Office	
Lauren Mermejo	Great Basin GRSG Project Manager
Joe Tague	Branch Chief
Marguerite Adams	Planning and Environmental Coordinator
Chris Rose	Public Affairs
Dan Kozar	GIS Specialist
Paul Roush	Contract Sage Grouse Wildlife Biologist
Sandra Brewer	Wildlife Biologist
Paul Petersen	Asst. Fire Management Officer
Sarah Peterson	Hydrologist
Mike Boomer	Fire Planner
Sandy Gregory	Fuels Management Specialist
Mark Coca	Weed Management Specialist
Alan Shepherd	Wild Horse and Burro Specialist
Robert Bunkall	GIS Specialist
Michael Schade	GIS Specialist
Scott Murrellwright	Geologist
Sheila Mallory	Geologist
Dave Davis	Geologist
Doug Siple	Minerals Specialist
Katheryn Dyer	Livestock Grazing Specialist
Stuart Grange	Mining Engineer
Mike Tietmeyer	Range Management Program Lead
Mary Figarelle	Lead Realty Specialist
Bryan Hockett	Archaeologist
Barb Keleher	Outdoor Recreation Planner
Leo Drumm	Outdoor Recreation Planner
Leisa Wesch	GIS Specialist
John Wilson	Wildlife Biologist/Healthy Landscapes
Lorenzo Trimble	Geologist
Whitney Wirthlin	Geologist
John Menghini	Petroleum Engineer
Dave Mermejo	Areas of Critical Environmental Concern, Wilderness

**Table 6-7
List of Preparers**

Name	Role/Responsibility
<i>Battle Mountain District</i>	
Doug Furtado	District Manager
Michael Vermeys	Assistant Field Manager, Renewable Resources, Mt. Lewis Field Office
Wendy Seley	Realty Specialist, Tonopah Field Office
Kathy Graham	GIS Specialist
<i>Carson City District</i>	
John Neill	Assistant Manager, Stillwater Field Office
Colleen Sievers	Carson City RMP Project Manager
<i>Elko District</i>	
Tyson Gripp	Natural Resource Specialist
Carol Evans	Fisheries Biologist
Victoria Anne	Planning and Environmental Coordinator
<i>Ely District</i>	
Mike Herder	Associate District Manager
Paul Podborny	Wildlife Biologist
<i>Winnemucca District</i>	
Amanda De Forest	Supervisory Natural Resource Specialist
BLM-California	
<i>Northern California District</i>	
Nancy Haug	District Manager
Jeff Fontana	Public Affairs Officer
<i>Alturas Field Office</i>	
Megan Oyarzun	GIS Specialist
Arlene Kosic	Wildlife Biologist
Casey Boespflug	Zone Fuels Specialist
Alan Uchida	Rangeland Management Specialist, Noxious Weed, and ES&R Coordinator
<i>Eagle Lake Field Office</i>	
Rhonda (Sue) Noggles	Planner
Dereck Wilson	Supervisory Rangeland Management Specialist
Marisa Williams	Outdoor Recreation Planner
<i>Surprise Field Office</i>	
Elias Flores	Wildlife Biologist
Dan Ryan	Realty Specialist
Roger Farschon	Contract Planning and Environmental Coordinator
BLM-National Operations Center	
Josh Sidon	Socioeconomic Specialist
Julie Suhr-Pierce	Socioeconomic Specialist
Frank Quamen	Wildlife Biologist
US Forest Service	
Randy Sharp	Contractor Project Liaison
David Reis	Travel Management

**Table 6-7
List of Preparers**

Name	Role/Responsibility
Dustin Bambrough	Range
Paul Bartschi	GIS
Pam Bode	NEPA/Planning
Chris Colt	Wildlife Biologist
Madelyn Dillon	Land/ Special Uses
Dale Harber	Minerals
Pam Heavysesge	NEPA Records Management
Kolleen Kralick	Cultural/Tribal
Tim Love	GIS
Tim Metzger	Fire
Chris Miller	Economist
Craig Morris	Analyst
Cory Norman	Fire/Fuels
Lara Oles	GIS
Glen Stein	Team Lead
EMPSi: Environmental Management and Planning Solutions, Inc.	
David Batts	Program Manager
Holly Prohaska	Project Manager
Peter Gower	Deputy Project Manager
Meredith Zaccherio	Cumulative Effects Analysis, Biologist and Project Support
Carol-Anne Garrison	Public Comment Analysis and Project Support
Drew Vankat	Cumulative Effects Analysis and Project Support
Jennifer Thies	Project Support
Marcia Rickey	GIS Specialist
Jenna Jonker	GIS Specialist
Jordan Adams	Public Comment Analysis, GIS Specialist and Project Support
Kate Krebs	Special Designations and Project Support
Liza Wozniak	Cumulative Effects Analysis and Project Support
Sean Cottle	Administrative Record, Public Comment Analysis and Project Support
Katie Patterson	Project Support
Mario Murillo	Project Support
Samantha Sherwood	Public Comment Analysis and Project Support
Lauren Zielinski	Project Support
Amy Cordle	QA/QC and word processor
Morgan Trieger	Cumulative Effects Analysis and Project Support
Constance Callahan	QA/QC and Project Support
Jeff Johnson	QA/QC
Annie Daly	Administrative Record and Project Support
Laura Long	Technical Editor
Randy Varney	Technical Editor
Cindy Schad	Word Processor

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List of Preparers

Name	Role/Responsibility
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Rob Fetter	Project Manager – Socioeconomics
Alex Uriarte	Project Assistance
Roy Allen	Project Assistance

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