

Coalition for Nevada's Wildlife
P. O. Box 70143
Reno, Nevada 89570

February 3, 2020

Patricia Deibert
National Sage Grouse Coordinator
440 W. 2005 Suite 500
Salt Lake City, UT 84101

BLM-UTAH STATE OFFICE

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Dear Ms. Deibert:

The Coalition for Nevada's Wildlife is a coalition of Nevada sportsmen's organizations that have long-term experience in working through the public involvement process to conserve and enhance Nevada's wildlife resources. Therefore, we appreciate the opportunity to provide comments on the issues for analysis in the Environmental Impact Statement for 2021 Greater Sage Grouse Land Use Plan Amendments.

Nevada is a very important state for sage grouse because of the significant amount of greater sage grouse habitat that it contains. While we generally agree with most elements of the 2015 and 2019 greater sage grouse conservation plans, we also agree that a further analysis of these plans in the face of new science and available data is warranted. While the basic inimical factors as identified in the earlier plans remain with us, a further assessment of their influence on greater sage grouse populations is certainly needed. These include direct habitat loss from human activities such as renewable energy development, power transmission lines, road building, mining, livestock grazing, oil and gas development and urban development. Pinyon and juniper encroachment and raven depredation are also inimical factors that warrant further analysis. We are confident that these will be subject to your in-depth analysis.

We are, however, particularly concerned in Nevada about wild fire, climate change (drought) and exceedingly high populations of wild horses and burros. Sage grouse have been on a persistent long-term decline in Nevada, and we believe that wild fire has been a significant factor in this decline as hundreds of thousands of acres of greater sage grouse habitat have been lost over the past 15 years. Of course, climate change (drought) and wildfire are very much interrelated. While we support wisely placed fuel reduction and fire break projects, we believe that a paradigm shift in firefighting tactics is needed in the BLM with increased emphasis on the efficacy of initial attack with greater emphasis on the use of aircraft for this purpose. We also support an "all hands-on deck" approach to initial attack whereby ranchers, miners and other rural residents are prepared and trained to take up initial attack and thereby hopefully reduce the size of these devastating fires. We believe that such change should be evaluated in your analysis.

The importance of upland meadows, springs, seeps and other riparian systems have long been recognized as brood rearing habitat for sage grouse. We believe that these areas are a key ingredient of sage grouse habitat, but many of these areas are not in proper functioning condition. While livestock grazing plays a role in the diminishment of these areas, there are available methods and means to address this circumstance. However, we are particularly concerned about the impact of wild and free roaming horses on these important sage grouse brood rearing areas. The Wild and Free Roaming Horse and Burro Act mandates that horses and burros be managed at an appropriate management level to maintain a thriving natural ecological balance. With wild horse populations in Nevada at nearly

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four times the appropriate management level (AML) these riparian areas are being seriously degraded and in some cases are in jeopardy of being lost. Recent research from the U.S. Geological Survey has found that in areas where horses are at AML, sage grouse are stable to increasing and where horses are above high AML, sage grouse are declining. We believe that removing horses from the rangelands to achieve AML as quickly as possible should be a key consideration in future sage grouse habitat management. For a detailed discussion on this topic with supporting scientific data and references, we would refer you to the comments from a subgroup of our Coalition for Nevada's Wildlife known as the Coalition for Healthy Nevada Lands which has provided such detailed comments to your scoping process.

To hope to save greater sage grouse we must get serious about protecting and enhancing all elements of their habitat. We are hopeful that this Environmental Impact Statement and resultant Land Use Plan Amendments will do just that. We appreciate your consideration of our comments and our opportunity to provide them.

Sincerely,

The Coalition for Nevada's Wildlife:

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

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

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

Bob Brunner - Director

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

Mike Cassiday – Director (also past President, Northern Nevada SCI)

Rex Flowers – Director (also former Washoe County Advisory Board)

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Johnathan Lesperance – Director (also President, Nevada Sporting Dog Alliance)

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

Linda Linton, Esq. - Director

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

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

Bob Sack – Director (also Nevada Bow Hunters Association)

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Tom Smith
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