

Greater Sage Grouse Bi-State Distinct Population Segment Forest Plan Amendment

- The affected area includes ~ 5,040,400 acres, including ~781,700 acres of Bi-State Sage Grouse habitat, of which ~ 648,000 acres are on FS and BLM managed lands .
- ~ 50% of the designated Nevada acres are in Esmeralda County.
- Major identified threats are: from infrastructure (fences, power lines, and roads), recreation, mining, energy development, grazing, fire, invasive species, noxious weeds, piñon-juniper encroachment, and climate change.
- Intent is to restrict access to identified areas, some permanent, some seasonal. Any restriction of access will have severe negative economic consequences within Esmeralda County.

Recommendations

For Esmeralda County

Postulates

1. Given there is NO evidence to support a contention that the current Bi-State Sage Grouse population in Esmeralda County is below that of pre-settlement, e.g., ~ 1860 (assuming there was a Sage Grouse population at that time, i.e., the Sage Grouse is native). The Sage Grouse population has increased in areas where ranches have grazing livestock.
2. Given there is no evidence that the current (assuming one exists, given there have been no scientific studies) Bi-State Sage Grouse population or habitat is threatened by the citizens and residents of Esmeralda County.
3. Given there is no scientific evidence (specific DNA comparisons) to show that the Bi-State Sage Grouse is a separate species or sub-species, given there is no evidence to support the Greater Sage Grouse is endangered.
4. Therefore the implementation of the proposed plan to deliberately expand past any possible historical habitat will have severe negative economic impacts on Esmeralda County.

Hypothesis

- There is, at least, circumstantial evidence that non-native species such as ravens and crows, (predators), Asian Collared Doves and feral horses/burros (competitors) are more destructive to the habitat and Sage Grouse population than any human related activities in Esmeralda County.
- There is no reason to designate areas that have no known scientific identified Bi-State Sage Grouse populations, i.e., almost all of Esmeralda County. Even those limited areas, based on anecdotal data, have no known or proposed threats that would measurably reduce the population.
- Unless the Federal government first takes actions to mitigate this source of damage, there is no valid reason to reduce the economic viability of Esmeralda County by implementing the proposed plan.

Recommendation 1

- Implement Alternative 1 – No Action (Do NOT amend the current plan).
- Reason: Esmeralda County has a population of < 1 person per ~ 2000 acres. Any changes in regulations would have a negative economic impact on the county, e.g., by restricting access to county roads/trails, reducing farming capability, restricting communication & power corridors.

Recommendation 2

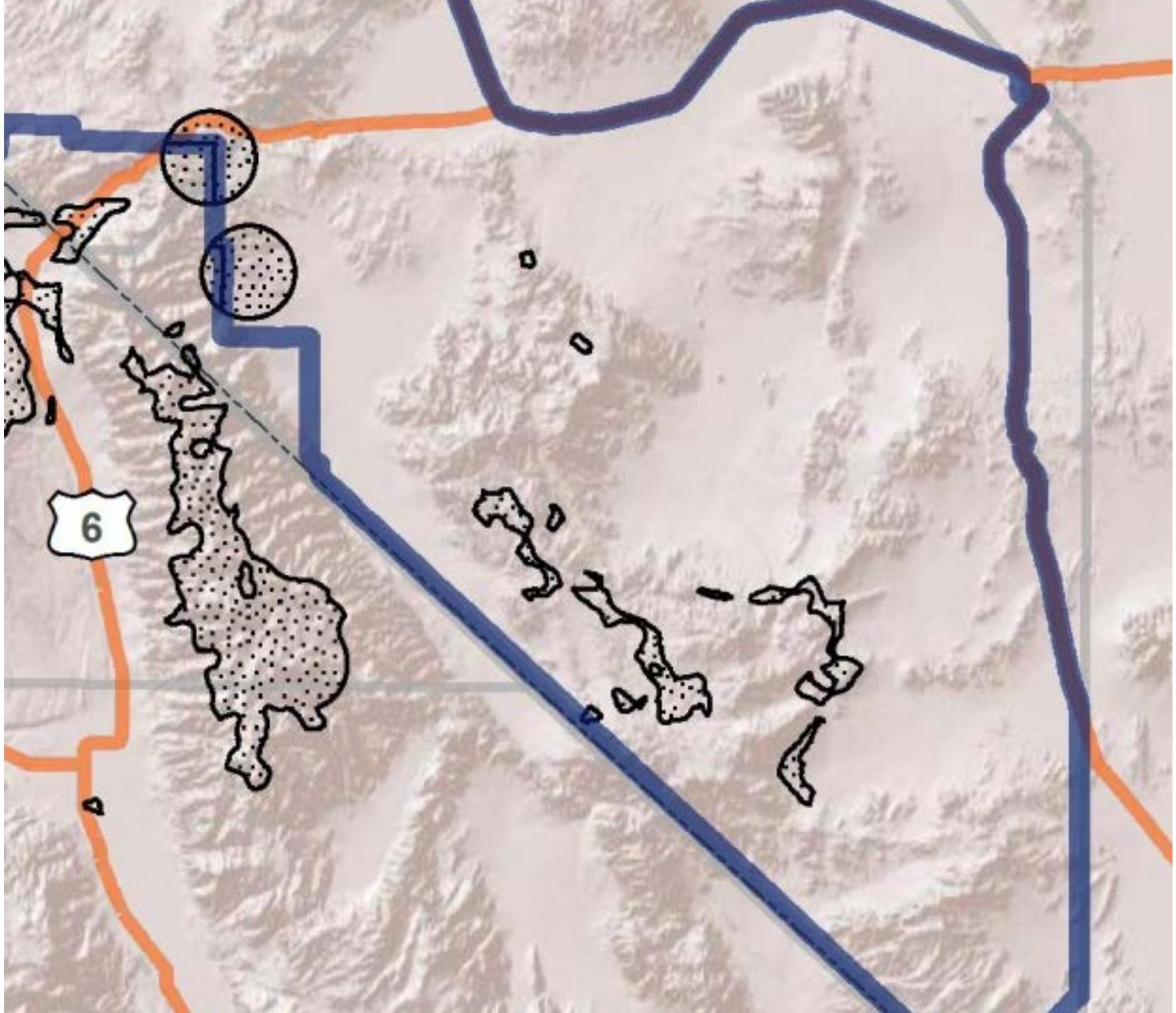
- If Recommendation 1 is not implemented for Esmeralda County, then only implement the following:
- Maintain feral horse/burro populations within designated limits.
- Reduce non-native bird populations, e.g., Asian Collared Doves, ravens, crows.
- Restore appropriate denuded areas on public lands.

Recommendation 3

- Restrict implementation only to those specifically identified (on the FS proposal map Figure 3) Bi-State Sage Grouse lek (breeding) areas (next slide has EC portion of map), once scientific studies have proven these actually exist.
- Exclude implementation for five kilometers on either side of a state highway or county road/trail or adjacent to private property.
- Exclude implementation within one kilometer for any existing or proposed communication or power transmission line corridor.

Recommendation 4

- Esmeralda County should share our findings and position with other affected counties to provide a joint position.
- While Esmeralda County is somewhat unique (i.e., limited or no scientific evidence of any native Sage Grouse population) compared with the other counties, our end goal may be the same, i.e., prevent adoption of the proposed amendment.



Restrictions

- 1. There shall be no implementation of the habitat restrictions within 5 kilometers of any existing road, trail, or private property, or within 1 kilometer of any existing or proposed power or communication right-of-way.
- 2. Any lands that are labeled for Bi-State Sage Grouse habitat will require the Federal Government to pay Esmeralda County an additional (to the existing Payment in Lieu of Taxes) minimum of \$1/acre per annum for each acre so designated.

Comments

- There is no scientific evidence verifying the existence of the Bi-State Sage Grouse or of any threats to the habitat (of the non-existent Grouse) within Esmeralda County. Therefore, Esmeralda County should be excluded.
- This exclusion of Esmeralda County from the amended plan would minimize the work load/costs for FS, FWS, and BLM. The exclusion would eliminate negative impacts on the economy of Esmeralda County.
- Esmeralda County represents ~ 50% of the total land area designated (for NV), but has the least human population. There is no scientific evidence that the anecdotally observed Sage Grouse are the Bi-State Sage Grouse; therefore, any restrictions have little or no beneficial results for any Sage Grouse habitat and population.

Comments

- Esmeralda County is a transitional zone between the Mojave Desert and the Great Basin.
- Therefore, the majority of Esmeralda County is not a suitable habitat and only a small area may be a marginal habitat for the Bi-State or Greater Sage Grouse. Reference the NV Department of Wildlife Greater Sage Grouse Habitat Categorization Map.
- Given there is no scientific evidence that there are any threats to this marginal habitat by any human activity or structure, the proposed amendment should not be implemented for Esmeralda County.

Comments

- Clearly the methodology utilized to develop the plan is faulty. The assumptions (not facts) listed in the plan are tailored to support the desired outcome. Esmeralda County was not included in the planning process.
- The known facts that contradict the desired outcome are ignored, e.g., grazing on public lands has increased the population in other counties, some identified areas have no historical population (and currently have populations only because of man-made water sources).
- While the plan states there is no impact on private land, some of the access restriction requirements are directly aimed at restricting access to private land (at least during the breeding season, April/May).

Question 1?

- Given the current methodology (advocated by the Bi-State Local Area Working Group) is successful, and;
- Given that there are no assurances that the proposed amendment will meet the stated goals and objectives (increasing the Sage Grouse population and improving the habitat);
- What is the proposed course of action if (when) the amended plan fails to meet those goals and objectives?

Question 2?

- Given that the Bi-State Sage Grouse is not scientifically proven to be native to Esmeralda County and almost all of Esmeralda County is not a suitable habitat for the Bi-State Sage Grouse;
- What methods and numbers are going to be used to import, transplant, or otherwise bring Bi-State Sage Grouse to Esmeralda County? Is there a scientifically sound method to transfer the non-native Bi-State Sage Grouse (given there is no DNA evidence that the Bi-State Sage Grouse is a distinct species or sub-species) without importing other non-native species that will have negative environmental effects?
- What is the course of action if the imported Bi-State Sage Grouse to a marginal habitat do not survive or expand?