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DEPARTMENT OF WILDLIFE

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10/8/2020

Josh Nicholes
District Ranger
660 South 12th Street, Suite 108
Elko, NV 89801
775-778-6109

Re: E2021-063 EA USFS Coleman Exploration Project

Dear Mr. Nicholes,

The Nevada Department of Wildlife (NDOW) thanks you for the opportunity to provide input on the Coleman Exploration Project EA. We understand that the project proposal is exploration activities for up to 50 acres of disturbance. After reviewing the project, we have provided our initial feedback below.

Aquatics:

Both Poorman Creek and Coleman Creek have documented populations of Columbia spotted frog (*Rana luteiventris*), a species identified on the USFS Humboldt Forest sensitive species list. These creeks are also located within a watershed occupied by redband trout (*Oncorhynchus mykiss gairdnerii*). Both species are identified as Species of Conservation Priority in the State of Nevada Wildlife Action Plan. While neither species is currently federally listed under the Endangered Species Act, NDOW recommends additional coordination on these species with the Humboldt-Toiyabe Aquatics/Fisheries Specialist.

Diversity Species/Eagles and Raptors:

NDOW recommends a bat acoustic baseline survey be conducted in the project area. The baseline data would be important for assessing potential impacts to several sensitive and protected bat species.

Within the scoping document it states that raptor nest buffers would be avoided March 1-August 31 each year, how will the buffered nests be determined for the avoidance timeframe? Will there be annual inventory and occupancy surveys for all raptor nest within a certain distance of proposed disturbance? If so, what survey protocol(s) and/or state of federal wildlife agency recommendation(s) and buffer distance(s) will be adhered to? For example, NDOW recommends a one-half mile "no-activity" buffer for any active

Sage Grouse:

There are currently one active and one pending sage grouse leks within a 4-mile buffer of the project area. The Coleman Canyon road is immediately adjacent to an active lek. NDOW

recommends that access to the project site on the Coleman Canyon road be excluded from March 1-July 15. All standards and guidelines from the USFS 2015 Greater Sage-Grouse Plan Amendments should be applied to this project for Sagebrush Focal Areas (SFA) and Priority Habitat Management Areas (PHMA).

We also recommend that USFS ensure that the Sagebrush Ecosystem Technical Team (SETT) has been contacted regarding the Conservation Credit System (CCS) as State Law requires proponents to mitigate anthropogenic disturbances in greater sage grouse habitat. Please keep in mind that not all projects that are evaluated through the CCS will require mitigation, but the CCS will make that determination. Once the SETT has evaluated the project impacts, they will provide a letter to both the proponent and to USFS for records, whether mitigation is needed or not. While it is the proponent's responsibility to meet all State of Nevada requirements by law, we understand that it is in the best interest for all parties involved to ensure all applicable Federal and State laws are adhered to in order to facilitate the project's compliance requirements and timelines.

Big Game:

Pronghorn Antelope summer within and adjacent to the project boundary; NDOW recommends a 15 mph speed limit for this exploration project.

Reclamation:

Regarding reclamation activities, NDOW asks to be consulted during the seed mix and application design. Broadcast seeding for many grass species generally is not the preferred method as drill seeding has a higher likelihood of success. Additionally, grass and forb species alone will not provide cover for wildlife, and the addition of sagebrush to the mix would benefit sage grouse, pronghorn and a variety of non-game species occupying the area. The area is greatly lacking in brush community and creating sagebrush "islands" on reclaimed sites would be an effective reclamation endeavor.

Roads/Access:

NDOW also request a clarification on the road access. As described, it is unclear whether the access roads be open or closed for public access? Will there be closure periods?

We appreciate the opportunity to provide comment on this and request that NDOW be kept up to date as this project moves forward. Should you need clarification on any of the information provided, or require additional information, please contact Lindsey Lesmeister at llesmeister@ndow.org or 775-777-2368.

Sincerely,

A handwritten signature in black ink, appearing to read "C. M. Smith", is written over the printed name.

Eastern Region Habitat Supervisor
Nevada Department of Wildlife