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First name: Dave

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Organization: Humboldt County Nevada

Title: County Manager

Comments: RE: Objection regarding the Greater Sage-Grouse Draft ROD and LMPA for NFS Land in Nevada

Dear Ms. Rasure and Mr. Ferebee,

Humboldt County, Nevada (County) would like to express appreciation for efforts the United States Forest Service (USFS) has taken to work with the County and other stakeholders during this Land Management Plan Amendment process for the Greater Sage-Grouse. The County plays a unique role in conservation and management of the Greater Sage-Grouse, and to that end, the County appreciates the USFS commitment to collaboration, coordination, and communication. Below Humboldt County presents its remaining concerns with the Greater Sage-Grouse ROD and LMP A for NFS Land in Nevada:

On July 27, 2018 the County submitted comments to U.S. Forest Service on the Greater Sage Grouse Proposed Land Management Plan Amendments (see attached). The County also worked with the Nevada Association of Counties to provide extensive comments to the Draft EIS and Administrative Draft and Final EIS documents. Finally, the County participated in a host of Cooperating Agency meetings throughout the collaborating process.

The County submits this letter in response to the USFS's Draft Record of Decision (ROD) and Land Plan Management Amendment (LMPA) for National Forest Service Land in Nevada on the Humboldt-Toiyabe National Forest released on August 2, 2019. The County is an authorized entity.

Protest Issue 1: Detrimental Noise Level Determination

Parts of the Plan Being Protested:

Greater Sage-grouse General

GRSG GEN-ST-009-Standard

Humboldt County's Interest in Filing this Objection:

Noise limitations on unauthorized activities, or activities pending authorizations can have significant impact on the ability of the County to provide administrative or emergency functions. For example, maintaining roads, or trails could result in temporary exceedance of this Standard.

Previous Documentation Addressing the Issue:

Both the County and NACO suggested a modification to the above-ambient noise threshold in its Document-Specific Comments to the Greater Sage Grouse Draft Record of Decision and Land Plan Management Amendment. Specifically, regarding Table 2-7, at page 2-23, NACO suggested that GRSG-GEN-ST-009-Standard be modified to read: "Do not authorize new surface disturbing and disruptive activities that create permanent or long[shy]term and sustained detrimental noise levels ... "

Why the County is Objecting to Director's Decision:

While the County appreciates the clear exception for previously authorized activities, it remains concerned about the impact the 10dBa threshold will have on the County's ability to expand or improve infrastructure, or conduct administrative functions, including any functions or services not yet authorized. Also, the County is concerned that no language is included to create exceptions for activities that have not been authorized but which nevertheless may be essential. Language similar to, or identical to the language of GRSG[shy]LR-ST-15-Standard would be helpful here. For instance, language creating an exception for public health, public safety, re-authorizations or renewals, and routine administrative functions.

Protest Issue 2: Three Percent Anthropogenic Disturbance Cap/ Application to BSU Boundaries:

Parts of the Plan Being Protested

Greater Sage-grouse General

GRSG-GEB-ST-005-Standard

Humboldt County's Interest in Filing this Objection:

This standard has the potential to impose significant restriction on routine county functions cannot be understated. Furthermore, the County seeks assurances that the anthropogenic disturbance cap standard is grounded in the best available science.

Previous Documentation Addressing the Issue:

The County and NACO requested that USFS provide further information as to how the standard was developed, and for documentation of the best available science that supports it. The DEIS Table 2-7 Proposed Action, pages 2-81 & 2-82, GRSG GEN-ST-005- Standard also failed to elaborate on the science supporting the 3% cap. Furthermore, THE COUNTY'S requested clarification as to how such a cap would be adjusted if BSU boundaries should change.

Why Humboldt County is Objecting to the Director's Decision

The LMPA cites several appendices and figures to help elucidate features of the 3% cap. However none of the figures referenced offer any clarification for the methodology, sources, studies, or science used for the 3% formulation. While the County does not doubt USFS considered available science in formulating the 3% disturbance cap, without reference to the material or methodology, it is difficult to determine whether it was the best available science. Furthermore, the County reiterates its concern over how the 3% cap would be adjusted if and when a BSU boundary changes. The County appreciates the exception for projects that may be approved because they result in a net conservation gain. The County also appreciates the exception for exceeding the 3% cap in existing designated utility corridors if the site specific NEOA analysis indicates a net conservation gain.

Protest Issue 3: Coordination and Consultation with Respective County

Parts of the Plan Being Protested:

Roads/Transportation

GRSG-RT-GL-072 Guideline to GRSG-RT-MA-077 Management Approach

Humboldt County's Interest in Filing this Objection:

Travel restrictions impact local communities by interfering with county obligations to provide regular and emergency services. These impacts include interference with road maintenance, provision of public safety services, impediments to landowner access to their private property, and prohibiting the travel of ranchers, hunters, recreationists, and exploration geologists.

Previous Documentation Addressing the Issue

See Page 6 of 8 in the attached comment letter. The County requested that language be added to the LMP A that requires consultation and coordination to be conducted with the respective county prior to any road closures or travel restrictions, and that any road closures, seasonal or otherwise, must be coordinated with the local government. Despite the County's proposed consultation and coordination requirement, the LMPA does not require the proposed coordination or consultation.

Why Humboldt County is Objecting to Director's Decision:

The Director's decision to approve the LMPA's standards, guidelines, and management approaches relating to Roads and Transportation will have a detrimental impact on affected the County's abilities to conduct routine administrative functions traditionally under the immediate control of counties, such as weed treatments, fuel reductions, grazing etc. Some USFS roads provide access to private lands and water rights.

GRSG-RT-ST-073-Standard in particular is both vague, and overbroad. For instance, it implicitly prohibits activities that would otherwise be permitted simply because of that activity's mere proximity to a lek. This standard makes it unclear as to whether minor and minimally disruptive activities that would comply with 3% disturbance cap, or be under the dBa threshold would be prohibited. If so, the rationale is unclear, and the USFS could prohibit even minor, minimally disruptive trail, or road maintenance during seasons in which such maintenance is a priority.

The County's request that USFS consult and coordinate with counties when considering the closure of roads, seasonal or otherwise, represents a modest proposal.

Protest Issue 4: Priority for Native Species in Habitat Restoration

Parts of Plan Being Objected to:

Fuels Management:

GRSG-FM-GL-049-Guideline

Humboldt County's Interest in Filing this Objection:

Fire and invasive species continue to pose the highest threat to Sage-grouse and its habitat. The County continues to support the use of desirable non-native, non-invasive plants in combination with native species for habitat restoration, as native species are often expensive, difficult to obtain, and don't always compete well with invasive species. Counties bear the most immediate socio-economic impacts of rangeland fires in Nevada. Rangeland fires continue to profligate across the Great Basin as a result of, insufficient landscape restoration, proliferation of fire-conducive invasive species, and fire. For instance, cheatgrass thrives in disturbed areas (e.g. burned areas) and serves as prime fuel for rangeland fires creating a vicious cycle of cheat grass, fire, more cheatgrass and more fire.

Previous Documentation Addressing the Issue:

See cover letter and page 6 of 8 of the attached letter for the County's expression of support of use of desirable non-native species.

Why Humboldt County is Objecting to Director's Decision:

GRSG-FM-GL-049-Guideline barely limits the blanket preference for natives, if at all, by recommending their use "when available" or when "timely" reestablishment of native plant materials is "not likely to occur". The County believes that all tools (including desirable non-native plant species) need to be available to maintain ecological processes.

Native species are expensive, often difficult to obtain, and don't always compete well with non-desirable invasive species. Strict use of natives can limit the size and effectiveness of a habitat enhancement or restoration project. Desirable non-native species that are more readily available, more cost effective, more competitive with non-native annual grass species, and which provide a similar ecological functionality should also be encouraged for use. As before, the County suggests the USFS work with the Agricultural Resource Service's Great Basin Rangeland Research Center in Reno to identify science monitoring data to support this approach.

Conclusion

The County appreciate USFS 's willingness to coordinate with individual counties, NACO, and affected stakeholders in the conservation of Greater Sage-grouse and its habitat. Thank you for incorporating many of the comments that Nevada's counties made throughout this process, and for your consideration of these few outstanding and important issues. If you have any questions, please do not hesitate to contact me.

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