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Title:
Comments: Elko County's Objection regarding the Greater Sage-grouse Draft ROD and LMPA for NFS Land in Nevada

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Introduction

Elko County is a county in the planning area that is directly affected by the planning for the recovery of the greater sage grouse. Nearly 73% of Elko County is owned and administered by Federal Agencies. The land managed by the US Forest Service is on the Humboldt-Toiyabe National Forest. Under the proposed action Nevada has roughly twice the total acres of sage grouse habitat affected by this plan of any other state, and over half of the GHMA.

Objection to Chapter 1: The agency does not have enough information about the historic distribution of Greater Sage Grouse to base an EIS on.

The secretarial orders requiring the Sage Grouse Task to cooperate in this review also were issued with the purpose of enhancing cooperation with local and state governments. Specifically, this FEIS is supposed to address new science and research. While there is new science and research available, there are also gaping holes in the research that have not been addressed and need to be for the agency to gain a complete picture of the sage grouse's place in the sagebrush ecosystem and its relationship to the other users in this ecosystem.

The most glaring holes have to do with the sage grouse's historical range. The FEIS specifically attempts to discern historical range, by incorporating any "area within the historical distribution of sage-grouse that is unoccupied, does not currently provide habitat, and does not have the potential to provide habitat in the foreseeable future (<100 years)[hellip]" into the definition of non-habitat.

It is no secret that the first travelers through the Great Basin recorded that they hadn't seen any sage grouse. Peter Skein Ogden's journal is clear on that point. John Bidwell, travelling across northern Nevada in 1839 along what is now the Humboldt River, wrote that his party had to butcher their own oxen because they did not see any other game.

What Elko County cannot find, and what the FEIS and the 2015 ROD fail to address, is what evidence there is that the Greater Sage Grouse was widely distributed through this area before European settlement. Elko County has been unable to locate any research that suggests that the sage grouse, a large, slow-moving bird, was exploited as a food resource on any large scale by the Native American tribes in the Great Basin. The Great Basin was described by early European settlers as a landscape almost devoid of wildlife. This is important because, if the goal of this process is to restore the sage grouse to their historic range, then accurate data

regarding their historic range is necessary. It is also necessary because, if Ogden and Bidwell were correct and there were few Greater Sage Grouse in this area before widespread European settlement, then the success of the bird must be tied at least in part to grazing livestock and that tie must be examined in greater detail.

The research shows that, in the Great Basin, the highest populations of sage grouse coexisted with high populations of cattle and sheep. As of now the data regarding the range of the Greater Sage Grouse only goes back a few decades, which is less than an eye-blink to this complex ecosystem. The fossil and archeological record shows that, nearly 7,200 years ago, the Sage Grouse along with other birds that rely on abundant surface water sharply declined as the climate changed and the Great Basin became more arid.

The decision to pick the 1950s populations as a benchmark for recovery has no more grounding in science than any other date with the data currently available. Applying this logic to any other species, bison for example, would be, of course, ludicrous. By the 1890s American bison were all but extinct in the wild, numbering around 1,000 animals. If any agency had chosen the 1890s as a benchmark for recovery, than the current population of around 31,000 bison managed for conservation goals would seem like a resounding success, rather than a shadow of their former population, which is in part evidenced by settler's journals.

The point of this is to illustrate that a few decades of research is not nearly enough to understand the sage grouse's role in the Great Basin's ecosystem as well as its relationship to other inhabitants. The need for continued research is clear. Chapter 1.1 of the FEIS points out that "[e]fforts to conserve the species and its habitat date back to the 1950s." If 60 years of conservation efforts have still resulted in the decline of populations then it is reasonable to assume that, at best, those efforts have had no positive impact, and at worst are detrimental to the bird. In order to know what needs to be done to restore the Greater Sage Grouse's population it is necessary to find out exactly how many sage grouse there should be, as well as where they lived in the past and what kinds of land use they have co-existed with.

Elko County therefore objects to the FEIS as written, specifically to the purpose and need section, because there is not enough evidence to base any conclusions about the historic range of the sage grouse on.