BACKCOUNTRY
HUNTERS & ANGLERS
NEVADA

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Project Name: Greenlink North Transmission Project

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Dear Nevada State BLM Office,

The Backcountry Hunters & Anglers Nevada Chapter appreciates the opportunity to comment on the proposed Greenlink North Transmission Project. Nevada's public lands are home to diverse wildlife and ecosystems that provide unmatched recreational, cultural, and ecological value. As such, we urge the Bureau of Land Management (BLM) to adopt a thorough, balanced approach that considers the critical importance of wildlife conservation in planning and decision-making for this project.

Concerns and Recommendations:

1. Protecting Intact Landscapes and Wildlife Corridors

The Greenlink North Transmission Project could fragment some of the most pristine and ecologically significant landscapes in Nevada, disrupting habitats that are critical for both game and non-game species. Key concerns include:

- Greater Sage-Grouse: The project intersects priority habitat management areas for the Greater Sage-Grouse, a species requiring large, unfragmented landscapes. Transmission lines and associated developments contribute to habitat loss and degradation, increase predator access, and create perches for raptors, which negatively impact nest success and chick survival. BLM should fully utilize the Nevada Habitat Quantification Tool to compensate for and mitigate impacts on this iconic species.

- Big Game Species: Elk, mule deer, and pronghorn rely on migration corridors for survival. Habitat fragmentation from transmission lines disrupts these corridors, leading to decreased forage availability, limited genetic diversity, and reduced population resilience. Collaboration and actual implantation of the Nevada Department of Wildlife's input is essential to identify and protect migration routes.

2. Cumulative Impacts and Mitigation Strategies

The cumulative impact of the Greenlink North project on central Nevada's wildlife cannot be overstated. Disturbances from new infrastructure introduce a cascade of ecological challenges, including:

- Habitat Fragmentation: Transmission lines and associated roads create smaller, isolated patches of habitat, which are less resilient to environmental changes. Fragmentation reduces biodiversity and impairs the ability of species to thrive.
- Invasive Species: Disturbances serve as vectors for invasive species like cheatgrass, which not only outcompetes native vegetation but also increases the frequency and intensity of wildfires, further degrading habitat. Comprehensive management strategies must be included in the Environmental Impact Statement (EIS) to address invasive species control and restoration of native vegetation.
- Vertical Structures and Predation Risks: Transmission lines introduce perches for raptors and predators such as ravens, which prey on sage-grouse and other sensitive species. Studies have documented decreased nest success and increased predation risks extending several miles from transmission lines. The BLM must integrate predator control measures into project planning to mitigate these effects.

3. Alternative Alignments and Land Use Strategies

We urge the BLM to prioritize alternatives that minimize ecological and wildlife impacts. Specifically:

- I-80 Corridor Utilization: Upgrading existing infrastructure along the I-80 corridor would reduce the need to disturb intact habitats and high-value wildlife areas. This approach also aligns with low-conflict zones, such as post-mining landscapes and private lands, and leverages existing transmission routes.
- Comprehensive Environmental Analysis: The EIS must rigorously evaluate all direct, indirect, and cumulative impacts on wildlife populations, with a strong emphasis on habitat connectivity and biodiversity preservation.

4. Monitoring and Adaptive Management

Given the dynamic nature of wildlife responses to habitat changes, it is imperative to include long-term monitoring and adaptive management strategies. These should encompass:

- Baseline Data Collection: Establish robust baseline conditions for affected species to measure project impacts accurately.
- Performance-Based Mitigation: Set measurable, enforceable objectives for habitat restoration and wildlife conservation, ensuring accountability.
- Collaborative Management: Partner with federal, state, and local agencies, as well as tribal and community stakeholders, to ensure a comprehensive, inclusive approach to wildlife protection.

In closing, the Greenlink North Transmission Project represents an opportunity to model how renewable energy infrastructure can coexist with robust wildlife conservation, rather than at the

expense of our state's heritage and ecological integrity. Thank you for considering these detailed comments. We are committed to working with the BLM to ensure a balanced and sustainable outcome for Nevada's public lands and wildlife.

Sincerely,

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