

Kacey KC, Manager  
State of Nevada Sagebrush Ecosystem Program  
201 South Roop Street, Suite 101  
Carson City, Nevada 89701

Dear Ms. KC,

The U.S. Fish and Wildlife Service (Service) is committed to helping make the Nevada Conservation Credit System (CCS) a successful method for mitigating impacts and providing conservation gains for sage-grouse. To that end, the Service's Mitigation Review Team (MRT) will review the CCS and advise you on what regulatory assurances the Service can offer to CCS participants. However, the schedule you proposed for the review process will be difficult.

Nevada's Conservation Credit System, like the other habitat exchanges in development across the range of sage-grouse, represents a new approach to compensatory mitigation and conservation. The Service must use caution when considering how the agency's policies and the Endangered Species Act apply to novel systems.

The MRT is comprised of the Service's experts on compensatory mitigation programs like the CCS. However, the individuals on the MRT have only so much capacity. The Service has been asked to review several mitigation programs for sage-grouse across the species' range, and it is important that we ensure the appropriate level of consistency in any regulatory assurances that we may offer to those programs. Methodical review of these programs by the MRT is one part of ensuring that consistency.

For these reasons, the MRT will work with you to determine a timeframe and process for the Service's review of the CCS. To facilitate the MRT's review, I strongly recommend that you review the Service's Greater Sage-Grouse Range-Wide Mitigation Framework and be prepared to address the Questions Guide in Appendix II of that document. Furthermore, the MRT will want to review the Memorandum of Understanding between the state of Nevada and the federal land management agencies describing how the state-administered program and resource management plans accommodate each other.