

blm_nv_ccdowebmail@blm.gov

December 20, 2015

Dear Carson City BLM,

WildLands Defense is submitting these initial scoping comments on the revised Bi-state Sage-grouse EIS Notice of Intent.

A new EIS must be prepared to assess the full array of ecological science, and habitat degradation and loss that the bi-state sage-grouse population faces. This must also include detailed analysis of the habitat degradation and loss faced by pinyon-juniper species whose survival is greatly threatened by the barrage of “treatments” agencies are imposing – especially when combined with other serious threats of development, mining, energy siting, wildfire, etc.

We urge BLM to take this opportunity to adopt full and integrated protections across the range of BLM lands occupied by bi-state sage-grouse, including lands in adjacent California near Bodie. These lands should be included in the EIS analysis area, as the population is greatly threatened by the adverse effects of livestock grazing and large-scale cheatgrass-promoting federal agency treatments.

The Notice proposes the following:

The clarification and changes include: (1) Identifying disturbance levels within BSSG habitat; (2) Adjusting buffers for tall structures near active or pending leks; (3) Adding a restriction for new high-power transmission lines; and (4) Changing on-the-ground management for habitat connectivity.

The Notice too narrowly constrains the agency actions. The new EIS must take a candid and fresh look at the inter-connected actions of the previous effort.

Disturbance

Grazing of Livestock and Herds of Livestock Is A Disturbance. BLM must fully consider livestock grazing to be a disturbance, identify the severity and impacts of the disturbance, and set strict limits on this disturbance in space and time.

BLM must use this EIS process to determine where grazing needs to be removed to heal trampling-disturbed lands, for example, before lands become choked with annual invasive grasses.

In any areas that continue to be grazed, there must be strict limits on upland and riparian trampling disturbance.

Even a rapid examination of aerial photos in many areas shows the very significant disturbance caused by artificial upland water source placement. Livestock trails are

readily visible in Google Earth Images. This intense use alters, degrades, and often destroys the characteristics of the vegetation and soils required by sage-grouse and other wildfire for meeting their seasonal needs such as nesting, and overall survival.

Grazing Facilities and Combined Degradation Effects Are A Disturbance. Livestock fences, water developments, and other facilities represent a disturbance to the habitat, and unplanned but linked roading often accompanies this disturbance. The severe impacts of livestock use shifted and intensified by facility placement must be considered disturbance.

Vegetation Treatments Must Be Considered Disturbance. BLM has been proposing a smokescreen of treatments to kill woody vegetation (sage, trees), rather than reduce stresses on and threats to sage-grouse habitats. BLM and USFS vegetation treatments must be considered disturbances. These also often have long-lasting severe impacts. Treatments that deforest lands and/or thin or kill or crush sage result in hotter, drier, depleted sites where cheatgrass, medusahead and other weeds thrive. Plus livestock more thoroughly damage areas cleared of woody vegetation. These projects must be considered disturbances, too.

Serious Scientific and Analysis Flaws Pervaded the Initial EIS

The initial EIS contained a host of omissions and errors related to current ecological science for arid lands sagebrush and pinyon-juniper ecosystems.

It relied on only a very limited range of "range" science.

It blindly ignored the historical record of massive mining era and other deforestation. See for example Lanner *The Pinyon Pine* 1981, Young and Svecjar 1999, Lanner and Frazier 2012. Please also review the General Land Office Records for the region.

Please conduct this analysis as an integral part of understanding the disturbance processes, HRV, fire frequency and other information that are being plugged into increasingly complex models (such as NRCS Ecosites) that agencies use to make claims trying to legitimize treatments.

Agencies relied on a severely flawed, unvetted closed door 2012 "TAC" report covering the range of BSSG as the basis for the

Both the TAC report and BLM and the Forest Service EIS relied on incorrect and inaccurate fire return and disturbance intervals and other erroneous claims and model inputs for sagebrush and pinyon-juniper ecosystems. These inaccurate intervals are used to justify massive treatment disturbance that will further expand habitat fragmentation, loss and domination by weeds. Agencies must conduct honest analysis this time around, and honestly consider the severe ecological effects of the massive deforestation, sagebrush "thinning" and other projects claimed to "restore" sage-grouse habitat.

Develop a Real Plan, and Show Its Effectiveness

Agencies must identify and develop a plan for real on the ground ecological restoration of the less rugged areas of the landscape that BSSG will actually use – with native grasses, forbs and shrubs.

This is necessary to prevent continued destruction of pinyon-juniper and other habitats that are themselves very important to many species of wildlife – like the pinyon jay, and many migratory birds and raptors, and to protect watersheds, and aesthetically pleasing and climate-moderating forests.

BLM and the Forest Service rely on similarly flawed NRCS Ecosite “models” (incorrect disturbance intervals, ignoring climax vegetation communities, ignoring the historical record – including General Land Office Surveys, forestry accounts, historical narratives, documentation of the massive extent of post-settlement deforestation from the mining era up through current large-scale “treatment” manipulation and deforestation).

It appears to us that this is done as a distraction from taking action on the need to both protect and restore damaged mid and lower elevation lands as sage-grouse habitats.

It also appears to be done in order to have some way to try to justify allowing expanded development (with various disturbance caps, for example), in areas currently occupied by BSSG that are already under great stress.

The false inputs and models are used to create the illusion that new BSSG habitat can be “created”, so it is ok to develop areas of the very limited habitats that BSSG populations currently manage to occupy. Note that we strongly oppose allowing ANY additional development in BSSG habitats, and the disturbance caps simply will not work in this highly fragmented landscape.

The bottom line is the previous EIS was based on incorrect claims about the natural ecological communities inhabited by BSSG. These false claims were then used to develop plans that justify massive treatments targeting native vegetation communities, rather than take better care of lands currently inhabited by grouse.

It is those lands where this new EIS must focus on removing habitat d-dooming grazing, injurious and lethal livestock facilities, roading and other significant existing disturbance. Focus must be on the lands that have the terrain, elevation, topographic and other features that sage-grouse like to inhabit. Not on large-scale deforestation of rugged pinyon juniper habitats. Sage-grouse habitats are often complexly interspersed with pinyon-juniper, and were historically.

Lanner and Frazier 2012 (describing massive deforestation and historical records documenting this), Bukowski and Baker 2013 (review of GLO records finding dense sage was common, and trees routinely interfacing with sage communities).

Agencies Must Maximize Protection of All Native Vegetation Communities

Agencies cannot rely on the claims of researchers who have refused to examine the historical record, have biased outcomes of studies by pre-selecting areas with fire scars to do fire interval studies in, etc.

Instead of claiming native trees are encroaching, invading, etc., agencies must carefully identify where the trees are actually reoccupying sites where they are the natural climax vegetation community through careful consideration of on the ground evidence (old tree roots/stumps, GLO records, forestry reports, charcoal operation remains. Etc.).

The pinyon-juniper forests across the region are under serious threat from drought, large-scale loss from a welter of treatments on BLM, FS and private lands – lavishly funded with NRCS or other sage-grouse funds, and other disturbances.

Many of the treatment projects claim that the trees are being destroyed in part to suppress fires. Instead of suppressing fires, deforestation actually INCREASES the risk of frequent fires. This, like sage-brush thinning treatments, results in hotter, drier, windier and more weed prone sites. Fire risk is increased, not decreased. Climate change exacerbates this.

The native pinyon juniper forests are very important habitat for many native wildlife species, for recreational uses and enjoyment.

Thorough on the ground biological inventories for all native plants and animals of concern must be conducted across the project area. The EIS must candidly analyze the areas of occupied habitats, the conditions of the habitat, the degree of existing fragmentation, and the status and viability of populations of concern. This includes pinyon jays, wintering American robins and Townsend's solitaires, cavity nesting birds. Native raptors, small mammals, rare plants, and many others.

A paramount threat to the survival of BSSG in many areas is the invasion of cheatgrass/medusahead and other weeds in disturbed native vegetation communities.

This cheat/medusahead invasion is caused and greatly facilitated by livestock depletion of vegetation communities killing and weakening native grasses and forbs, couple with trampling impacts tearing apart microbiotic crusts when they are wet and displacing soils, or pulverizing the crusts when they are dry. Belsky and Gelbard 2000, USDI BLM Belnap et al. 2001, Tech. Bull. on microbiotic crusts.

Zero Disturbance Cap and Expansion of Habitat Through Sage Restoration in Degraded Lands Must Be the Goal

We are very concerned that BLM is going in the wrong direction by merely tweaking the disturbance cap a little bit. No new disturbance must be the goal, coupled with rolling back and often removing existing disturbance altogether.

In habitats that are so heavily fragmented heavily degraded, are suffering continuing large-scale livestock disturbance, and undergoing serious flammable annual grass expansion, the agencies cannot allow additional disturbance. This is especially the case because the populations are already at such low levels. A 3% disturbance cap will not ensure viability. WHAT actions are really needed to ensure viability? What number of birds constitutes a viable population? What is the existing disturbance footprint of livestock grazing, facilities and roading in this landscape? How is it adversely affecting habitats and populations?

Livestock Grazing and Facilities MUST Be Considered In Any Disturbance Tallies

Agencies have wrongly excluded the serious physical and environmental disturbance of livestock presence, grazing activity, herding/trailing activity, facilities (and often linked roading) from estimations of disturbance.

In this new process, an honest and valid assessment of such disturbance must be developed.

This must include candid assessment of the impacts of the timing of disturbance interfering with BSSG and other sensitive species seasonal habitat needs for food, cover, and undisturbed space.

Buffers

Buffer areas must be greatly expanded. All areas within 6 miles of leks and 3 miles of all other sage-grouse seasonal habitats must be included in buffer zones. Sage-grouse are highly sensitive to noise and visual intrusions. Knick and Connelly 2009/2011. Buffers must also extend around roading.

Transmission Lines

This process should plan for a significant rollback/reduction in footprint of/mitigation for - transmission lines across the area. When are the rights-of-ways for various powerlines up for renewal? BLM must develop a comprehensive suite of actions and evaluations to take place at that time.

Any new powerlines must be bundled along the specific path of existing powerlines. Increased focus should be placed on renewable energy such as rooftop solar on private lands so that new lines are not needed. Immense new developments within or adjacent to BSSG habitats that would require new lines must be prohibited. Example: Mines, geothermal or other renewable energy plants.

Connectivity

The EIS must strive for connectivity for sagebrush species, and connectivity for pinyon-juniper. PJ must not suffer extensive collateral damage or be sacrificed. It is crucial that agencies focus on really restoring the relatively flatter, open areas where sage-grouse want to be, not dream up habitat "creation" schemes in the middle of nowhere. Please see preceding discussion of PJ communities. Thorough baseline inventories of historically forested areas must be conducted. How much loss has taken place? The same with sagebrush. WIAT are the causes? What is the condition of the understories, watersheds, and other ecological attributes in these communities? What are the causes of degradation, and how can these be minimized?

ALTERNATIVE ACTIONS FOR CARSON CITY LANDSCAPE EIS

Under this alternative, livestock would be removed from the most sensitive areas (pastures within allotments or allotments), to prevent degradation of critical habitats, and disturbance of wildlife during sensitive periods. This would also be done to preserve the values for both sagebrush and Pinyon-juniper species. BLM must conduct the basic biological surveys – for loggerhead shrike, Brewer's sparrow, pinyon jay, black-throated gray warbler, northern goshawk, flammulated owl, sensitive and important migratory bird habitats, current status of aquatic and other rare species habitats and populations. Sage-grouse habitats would be protected and restored, with all grazing disturbance removed from them. Within those areas where livestock are removed, facilities will be removed and restoration (as described below) will occur. In areas of less risk, grazing at stocking that could achieve the use levels described below would be allowed. Large livestock-free reference areas would be established. This combined would greatly enhance connectivity of habitats, and reduce, and minimize loss, impairment and fragmentation.

Ecological Recovery Alternative (ERA)

The Ecological Recovery Alternative will:

- 1) Protect remaining occupied sage-grouse habitats as well as other important areas to provide enclaves to protect rare, imperiled and sensitive species from chronic grazing disturbance and new development. It will significantly rollback and rehab many existing developments and disturbance in these habitats associated with livestock grazing and management. This will provide for secure habitats, recovering natural ecological functions, and connectivity.
- 2) Allow for passive restoration of lands to recover natural processes, and minimize and prevent invasive species expansion and enable recovery of sage-grouse, migratory bird, and pinyon-juniper and other forest area species.
- 3) Provide for active restoration of existing developments or disturbances that are harming habitats. Examples: Removal of harmful fences, stock ponds, spring developments, water pipelines, salt or supplement feeding sites, and their associated roading, and selected other facilities and disturbance as well. This reduces invasive species risk– since these sites serve as epicenters for initial weed invasion and then subsequent outward spread. So it also reduces fire risk by reducing risk of invasive annual/exotic grasses. It also increases the effectiveness

of passive restoration, and success of any native plant rehab/seeding as active vegetative restoration.

- 4) Provide for active restoration of some sites most infested with the invasive exotics bulbous bluegrass through recovery of natural vegetation and microbiotic crusts. Removal/reduction in grazing and other disturbances is necessary to ensure the tremendous taxpayer investment in such efforts.
- 5) Ensure lands are in the best possible ecological condition both before and after wildfires to minimize risk of invasive species spread. This also maximizes post-fire recovery and effectiveness of taxpayer-funded actions such as reducing the need for seeding since understories will be in better ecological condition. Livestock disturbance will be removed from some significant land areas, so sage-grouse and other wildlife populations impacted by wildfire will not suffer continued grazing disturbance in unburned lands of importance to the population - as is the current situation. Reductions in invasive exotic grass species will reduce risk of frequent fire and aberrant fire disturbance intervals.
- 6) Minimize adverse impacts of a broad range of disturbances on wildlife habitats and populations, and aquatic species watersheds that are impaired.

This will promote habitat connectivity, and conservation and recovery of sage-grouse, PJ-dependent forest species, migratory birds and other rare species while also protecting watersheds with aquatic species, and that are aesthetically pleasing to the public.

The ERA will remove livestock from lands found not to be suitable for continued use due to conflicts with sensitive species. A battery of harmful fences, water developments, salt/supplement weed infestation sites, etc. will be removed from large portions of the landscape, and other important habitats wildlife and aquatic species conservation and protection of habitats and wild lands. This will promote biodiversity, natural values, solitude, primitive and unconfined recreation, and untrammled wild lands to anchor populations.

Habitat will be conserved, enhanced and restored. The range and abundance of aquatic and terrestrial species populations will be increased. Current systematic surveys will be conducted at the start of this process, so a firm baseline of species occupancy abundance and viability of populations can be established.

In any areas where grazing might continue, BLM must significantly reduce grazing levels while applying much more conservative mandatory standards of livestock use. These conservative levels of use must include both riparian and upland trampling, utilization and other standards. Avoidance of disturbance during sensitive periods/seasons is mandatory. This enhances connectivity.

For any grazed lands:

The use levels must leave 9 inches of residual grass cover across understory communities at all times. This must be based on the grass composition present –not merely on sites where larger statured grasses may remain in depleted landscapes.

That in reality means 10-15% upland utilization, or no utilization at all except by wildlife, must be put in place. It must be measured at sites that are actually used to a significant degree by livestock. BLM cannot apply 30% or 40% utilization –this is inadequate to prove necessary residual nesting cover (9 inches) and also to promote adequate recovery. Utilization is averaged across the grass plants that are grazed. So typically, when an area “averages” 40% utilization - this means that many grass plants are grazed to levels of 60%. Even one time grazing use so severe can harm or kill native bunchgrass plants by removing growing plant parts and depleting scarce root reserves, as well as by exposing the grass crown to winter freezing damage or summer heat-desiccation. Native bunchgrasses did not evolve with intensive grazing by herds of large hoofed ungulates. See USDI Technical Bulletin Anderson 1991, Mack and Thompson 1982.

BLM must also apply an upland trampling standard to limit disturbance to soils, microbiotic crusts and native understory plants, as well as to limit increased young trees that BLM is so obsessed with killing. Microbiotic crusts are a frontline defense against invasive species. BLM must limit cattle trampling to less than 5% of the area of a square meter monitored at grazed sites across the pasture/land unit. No areas of the allotment, including those receiving the most intensive use, will be allowed to receive greater than 10% of the surface area trampling. Ranchers have horses and herders, and concentrations of livestock cannot be allowed to create epicenters of disturbance and weed invasion. Stocking must be properly applied so that these standards can be attained during every grazing disturbance episode and so that ranchers are grazing numbers of livestock they can control.

At least 6 inches of stubble height must remain on all riparian/meadow area herbaceous species at all times. This must be applied to all species – not just Nebraska sedge or species that grow right by, or in, water.

Riparian shrub browse and/or breakage must be limited to 5% of livestock-accessible new growth.

Livestock bank trampling (and spring-meadow trampling) standards must be applied that limit disturbance to less than 10% of livestock-accessible stream and all spring and meadow areas.

Areas extending back from the green line through the entire historic floodplain/meadow extent must be measured and monitored, and these standards applied. Plants that are not right by the water's edge are much less likely to regrow. They are critical for protecting and conserving vital watershed values, protecting riparian/meadow areas linked to aquatic habitat health. These areas in some sites may provide sage-grouse brood rearing. This promotes recovery of habitat components for species ranging from migratory birds to beavers that use willow thickets. Agencies have long biased monitoring of impacts by measuring only the thin greenline and species likely to regrow there following heavy grazing – rather than mesic areas that provide suitable conditions for the forbs required by sage-grouse broods. See Belsky et al 1999.

BLM must also apply upland shrub structural integrity standards to all shrubs and mountain mahogany. No sagebrush plants, mountain shrubs, mountain mahogany, ceanothus or other shrubs anywhere in the pasture should receive more than 5% breakage or other livestock impacts.

All of these standards must be applied as triggers for removal of livestock from the pasture. If the use level is reached, the livestock must be moved out. Timely and adequate monitoring must be conducted – with random spot checks if funding is limited.

If any of these standards are exceeded in any year, livestock reductions in numbers will be put in place - with reductions of 25-50% in stocking for each violation along with more herding and shorter periods of use. If ranchers are unable to meet these standards, they are unable to control their livestock, so the herd size is too large.

If standards are exceeded in multiple years, livestock grazing must be ended in the pasture.

Salt and especially supplement will not be used. Livestock trailing to such sites, and the impacts of concentrated use at these sites, severely alters and reduces native vegetation. These disturbed sites provide centers for cheatgrass, medusahead, and other weeds to spread outward from. Responsible herding and a herd size that can be controlled are required.

This will enhance health and connectivity of habitats and populations.

Habitat Security: Seasons of Use

These livestock use standards must be coupled with avoidance of any grazing/trailing disturbance during sensitive periods of the year.

No grazing will be allowed in occupied sage-grouse habitat during lek and nesting periods. This must be applied to all occupied sagebrush habitats. A significant portion of sage-grouse populations may nest considerable distances from leks, and distant leks may have greater nest success. By focusing protections only near leks, agencies are sacrificing a significant part of the remaining sage-grouse population and its habitats.

No grazing will be allowed in sage-grouse habitat during winter periods. This must be applied to all sagebrush habitats to provide ample undisturbed winter habitat for sage-grouse including during hard winters.

In all instances, livestock use must not be shifted and intensified into other fragile sites or other vegetation communities. To meet standards, livestock must be reduced, not moved elsewhere to create further conflicts.

No livestock grazing will be allowed in important migratory bird or nesting raptor habitat during nesting periods. This period can range from February (some raptors, owls) to July.

This will enhance habitat connectivity.

Restoration Actions – Both Active and Passive

Passive restoration: Passive restoration focuses on removal of disturbance to aid natural healing processes in the sagebrush ecosystem. Removal of livestock grazing promotes short, mid and long term healing so that the composition, function and structure of the components of the sagebrush and montane juniper ecosystem can recover (see Fleischner (1004, Belsky and Gelbard 2000) and sustain sage-grouse and juniper-dependent species and their populations. It also includes road closures where natural recovery of facility-related or other road ruts and road verge areas could take place.

Removal of livestock disturbance prevents livestock from disturbing nests and nesting birds. Disturbance of nests and nesting birds and habitat components promotes predation. Eggs can also be damaged by livestock trampling, or even eaten by cattle.

Removal of livestock disturbance also removes a source of abundant food or artificial water sources in uplands that serve to attract and subsidize mesopredators and nest predators like ravens. Dead livestock, carrion, livestock waste, livestock feed and supplements, sheep camps and other things that promote sage-grouse nest predators are reduced.

Sage-grouse, migratory birds, small mammals, pollinators of rare plants - all benefit from both recovering vegetation structure that helps screen nests from scent and visual predators, as well as a reduction in livestock-associated activity and substances that attract nest and egg predators.

This also eliminates pressure from livestock interests to kill coyotes and other predators that help to keep mesopredators in check. This helps restore a more natural predator-prey system and helps to limit mesopredators.

Active restoration to aid Passive restoration processes is also proposed: Active restoration aiding passive ecosystem recovery processes focuses on removal of fences, troughs and other livestock facilities to reduce sage-grouse mortality, reduce disturbance zones where weeds invade and thrive, reduce predator travel corridors, reduce nest predator perches, reduce habitat fragmentation/increase habitat connectivity, reduce structures that attract ravens and other nest predators, etc.

Active restoration practices:

Removal of livestock water troughs, pipelines and wells to reduce livestock disturbance to surrounding soils, microbiotic crusts, and native vegetation and to promote their health and passive recovery. This will also benefit sage-grouse and migratory birds through removal of sources for Mosquitoes that carry West Nile virus. West Nile virus also poses a threat to the health of human visitors.

Where possible, without further damage to springs/water sources, remove waterline piping and maximize water at spring/stream sources supporting diverse riparian and meadow vegetation. Natural flowing water reduces West Nile mosquito habitat. This will help to raise water tables, so larger areas of meadows provide for sage-grouse brood rearing.

Promote natural healing of headcuts to the maximum extent possible by limiting disturbance throughout the watershed. Do not merely dump rocks and boulders into headcut – as this often destroys the potential for any natural recovery of meadow systems, and leaves areas permanently cut off from former riparian/mesic zones. At times, a combination of methods may need to be used – but gabions and structural devices and boulder dumping should be limited, and restoration should strive for a functioning system – not leaving meadows high and dry as structural fixes typically do.

No livestock grazing will be allowed on any areas that are restored.

Seed local native ecotypes in areas of more intensive disturbance, and restore any crested wheatgrass or other areas where the agency has removed sagebrush, including any recent “treatments”.

Benefits: Recovery of composition, function and structure of the sagebrush ecosystem. Reduction in elevated perches for nest and egg predators and other conditions that promote nest and egg predators. Removal of centers of weed infestation and spread, removal of facilities and conditions promoting West Nile virus. Recovery of functioning watersheds. Potential retention and increase in flows and length of flows in currently ephemeral or intermittent drainages to promote brood rearing habitat and counter adverse impacts of climate change.

Other benefits: Prevent migratory bird, bat and small animal deaths from drowning. Promote recreational uses and human health (cleaner more abundant water, reduction in potential sites for disease-bearing mosquitoes and exposure to livestock pathogens). Promote persistence of perennial surface water flows and watershed conditions that retain and slowly release waters favoring sustained perennial flows.

Active restoration: Ripping/recontouring of roads and then seeding with native local ecotypes of shrubs and grasses. This promotes habitat security.

Active restoration: Selective hand-cutting of individually marked young conifers in areas of realistic potential use by sage-grouse. All wood will be left on-site. No slash piling, skidding, burning, or other disturbances.

Active restoration: Planting pinyon-juniper to re-connect burned and/or otherwise fragmented habitats.

Seeding

Conduct active restoration of areas disturbed by trough, fence or other project siting and/or removal operations, and provide targeted restoration planning to expand, reconnect or recover habitats required by native wildlife by:

- Inter-seeding sagebrush seed or seedlings.
- Active restoration of cheatgrass/invasive exotic grass infestation areas.
- Active restoration of all crested wheatgrass or other exotic seedlings.

In all cases, local native plant ecotype seeds and seedlings must be used.

By far the cheapest and most cost-effective method to sustain, recover and restore plant communities is to remove livestock grazing and trampling disturbance.

Monitoring sites in any areas where grazing might continue must be established based on site visits with the Interested Public – not just ranchers. Monitoring must trigger specific mandatory required actions, and not just loose uncertain claimed BMPs as “adaptive management”.

This must all be applied as Interim measures to protect the values of the sagebrush, pinyon-juniper, mountain shrubs, and other vital native woody vegetation in this ecosystem. BLM frequently attributes problems with lands and waters to historic grazing – ignoring that the current chronic grazing disturbance incrementally eats away at the remnants. Grazing prevents or greatly slows “recovery”. And even if one were to believe that “historic” grazing caused all the problems one sees on public lands, there are now scientifically recognized new threats of invasive species, altered fire cycles fueled by annual grasses, climate change, diseases, and other threats. Continued grazing and trampling depletion and disturbance are threats to the health of the ecosystem. Grazing causes harms and/or exacerbates and acts synergistically with other threats.

BLM must conduct risk assessments. These must systematically examine damaged areas - such as springs, seeps, intermittent drainages, damaged headcutting streams, sagebrush uplands that are vulnerable to cheatgrass spread, juniper forests where microbiotic crusts are greatly trampled --- to determine if these sites can withstand any continued grazing disturbance, i.e. if they are suitable for any continued grazing.

Immediate action must be taken to remove livestock from the pastures or watersheds – not simply use fencing while allowing intensive grazing disturbance to deplete watersheds and sustainable flows. These must also systematically examine all local populations of rare and sensitive species, and determine the threats to these populations, and the degree of risk of extirpation the population is under.

Under this alternative, grazing would be removed from occupied habitats in ACECs, and all other lands with significant risk of cheatgrass/exotic invasion or other serious degradation with continued disturbance, as well as lands where populations are at risk of extirpation or significant declines if grazing disturbance continues.

The Preceding Discussion identifies measures to address livestock grazing and grazing removal components, and measures to address fire and to aid recovery following fire, and ensure secure, recovering, conserved, sustained habitats and populations.

BLM must fully and fairly analyze the No Grazing alternative, as well to provide a full and adequate baseline for understanding impacts of grazing in any areas where it may continue.

Mitigation

Mitigation by avoidance is the first option to be considered and must be rigorously examined. It will be required in ACECs and occupied habitats for sage-grouse, rare and/or important pinyon-juniper species, and other imperiled biota.

Soils

Soils will be protected from wind and water erosion, Microbiotic crusts will help protect soils, and also sequester nutrients, and some species sequester Carbon dioxide. Minimizing soil erosion through limiting disturbance that makes soils prone to erosion also will help limit wind-blown soil transport that is exacerbating the impacts of climate change. Soils eroded as dust are deposited on snowpacks, causing earlier snowmelt. This will help mitigate climate change impacts to watersheds and habitats for native biota, and reduce dust in the air.

Vegetation

Composition, function and structure of native vegetation communities will be maximized to provide for healthy, resilient and recovering sage-grouse habitat components. See Mack and Thompson (1982, Fleischner (1994), Belsky et al. 1999.

See also integrated weed measures.

Cultural

The integrity of natural systems, plants and animals important to Native Americans will be maximized.

Integrity of cultural sites will be protected, and adverse impacts of disturbance to these sites will be minimized and often removed altogether.

ACECs

Large ACECs will be designated to preserve, protect, conserve watershed, pre-settlement and ancient trees and forest landscapes, and to restore and sustain sage-grouse populations and the sagebrush ecosystem on which the sage-grouse and pygmy rabbit

rely, as well as balance and achieve aquatic species habitat protections and those of pinyon-juniper communities.

Livestock grazing disturbance will be ended in ACECs.

Active and passive restoration will be conducted as described herein.

Other disturbances will be reduced and minimized to the maximum extent possible, as described herein and the particular risks posed to sage-grouse as identified in risk assessments conducted with this process.

Hazardous Materials

Use of herbicides will be minimized and used only with extreme care and used on exotic species. Flash burning, mowing, and selected hand cutting will be used as primary and preferred treatments to minimize use of and pollution by harmful substances. Only if no other alternative exists AND ground disturbances have been effectively controlled, will selected ground-based application of herbicides be used.

Use of other hazardous substances with existing mining, energy, or other development will be examined in a risk assessment, and contamination or infiltration into the environment will be minimized.

Integrated Invasive Species Management

Integrated invasive species management will be practiced.

Use of herbicides will be minimized to a very high degree, and used only as a last resort to achieve clearly defined goals and objectives. Flash burners, mowing of weeds and selected hand cutting will be prioritized. Only if no other alternative exists will selected ground-based application of a limited range of herbicides be used.

Vectors of weed spread will be addressed. Livestock will not be moved from areas infested with invasive species into public lands. Livestock will be quarantined before entering public lands if noxious weeds are present in areas last grazed. Lands infested with noxious weeds will not be grazed until weed infestation is eradicated and restored with native vegetation.

Any project vehicles will be washed, and will not drive through infestations during access to site.

Full and complete analysis of the risk of cheatgrass or other annual grass expansion will be conducted, and livestock use prohibited in areas where such disturbance will expand invasive annual grasses that drastically alter the wildfire cycle.

Other Vegetation Measures

If there ever is any legitimate need to reduce “thatch” in meadows, grass mowers will be used. Thus, livestock manure, trampling damage to soils, weed spread will be minimized.

Mowing of grass in any fuelbreaks will be used in any fuelbreak fuels reduction project (roadsides or other areas), and not herbicides. BLM Must conduct risk assessments related to firebreaks actually increasing likelihood of human-caused and other fires – by creating hotter, drier, windier sites.

Lands will be managed to be in the good or better ecological condition to help minimize adverse impacts of fire. Having lands in best condition when a fire occurs maximizes recovery post-fire.

Any fuels treatments will focus on interfaces with habitation or significant existing disturbances, or be specific focused areas, not sprawling “block” or “mosaic” treatments that greatly fragment habitats.

Habitat Security

Noise pollution, light pollution, vibrations, motions, tall vertical objects all will be minimized. All future NEPA reviews starting immediately in sage-grouse occupied habitats, native raptor, and other disturbance-sensitive wildlife will include sensory conflicts and habitat security as an element of the environment.

The need for buffers surrounding habitats will be examined here, as well.

We request meetings a site visit to discuss this proposal.

BLM has no large, livestock free reference areas here. This process provides an opportunity to change that.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Fite". The signature is written in a cursive, flowing style.

Katie Fite

WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738