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To: [BLM_HQ_GRSB_Planning](#)

Subject: [EXTERNAL] NV Outfitters & Guides Association Comments attached

Importance: Normal

Sensitivity: None

Attachments:

[Scoping comments GRSB 2-7-22.pdf](#) 

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See attached comments.

Rachel Buzzetti, Secretary

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February 7, 2022

Ms. Patricia Deibert
Acting National Sage Grouse Coordinator
440 W. 200 S. Suite 500
Salt Lake City, UT 84101

Submitted: [BLM HQ GRSG Planning@blm.gov](mailto:BLM_HQ_GRSB_Planning@blm.gov)

RE: Nevada Outfitters and Guides Association's Scoping Comments to the BLM Notice of Intent to Amend Land Use Plans Regarding Greater Sage-grouse Conservation and Prepare Associated EIS.

Dear Ms. Deibert

The Nevada Outfitters and Guides Association (NOGA) appreciates the opportunity to submit these comments on the on the Notice of Intent to Amend for the (GRSG). NOGA represents over 40 members that guide hunters, fishermen, and recreationists throughout Nevada. We operate under Special Recreation Permits and use public and private lands within the Greater Sage-grouse (GRSG) conservation plan.. Our members facilitate hunters, fishermen, and recreationists in their use of public lands. The proper management of the public resources of land, water, vegetation, and wildlife are critical to our business and economic survival. Because our livelihood is directly related to the ability to access public lands, we feel it is necessary to submit comments today.

NOGA recognizes the BLM's mandate and public interest in and importance of the environmental resources protection and multiple-use under FLPMA by the BLM. NOGA takes pride in responsible resource use and activities that its members conduct on public lands. NOGA is convinced that that the BLM can manage lands for conservation of the environmental qualities of the landscapes while allowing multiple-use which includes the various recreational pursuits that our members facilitate. Both objectives mandated to the BLM in FLPMA can be achieved simultaneously without sacrificing the protection of environmental resources including wildlife habitat.

NOGA finds it very hard to comprehend why predation and hunting of sage grouse are not analyzed so that the relative impacts can be put into context. BLM does not have to have a program for hunting or predation to include these population suppressing factors in the EIS. They must be included to understand how effectively the alternatives would address the conservation of sage-grouse. Cumulative impacts result from the incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of

what agency (Federal or non-Federal) or person undertaking such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place of a period of time [40 CFR 1508.7]. The actions by NDOW to regulate hunting and the actions by the U.S. Fish and Wildlife Service and NDOW to authorize predator control qualify as agency (Federal or non-Federal) undertakings. As such, they should be included in the EIS.

Under FLPMA, BLM is required to manage the public lands on the basis of multiple-use and sustained yield. *“Multiple-use management’ is a concept that describes the complicated task of achieving a balance among the many competing uses on public lands, ‘including, but not limited to, **recreation**, range, timber, minerals, watershed, wildlife and fish, and [uses serving] natural scenic, scientific and historical values.’¹ “Of course not all uses are compatible.”²* We recognize the difficult task the BLM faces to manage public lands for multiple-use while conserving the environment. However, recreation is part of the BLM’s multiple-use mandate and the agency must ensure that recreation is not unreasonably limited in EIS. The NOGA members facilitate recreation and the impacts of these conservation measures should be analyzed with respect to outfitting and guiding.

We agree that wildfires have consumed vast acreages of rangelands in the last decade and a half. Much of this acreage was converted to cheatgrass as a result of the high intensity and severity of these fires. However, there have also been fires that have resulted in release of native grasses and forbs. These areas burned more erratically, leaving islands of sagebrush to serve as seed sources for reestablishment of sagebrush. These fires also moved quickly due to high wind conditions at the time of the burn and heat at the ground level was not so excessive as to cause mortality of existing perennial grasses and the seed bank of these species. In these instances, the size of the fire was more of an impact on sage-grouse than the actual aftermath of the fire.

The spread of invasive species is not only related to wildfire. The agencies have lost sight of other factors that contribute to the establishment and spread of invasive species and the increasing size of wildfires. Invasive species and ever increasing wildfire sizes are symptoms of the problem, not the problem. Until the BLM takes an ecological approach to addressing the problem, these symptoms will continue, and will continue to divert funding and attention from the real problem.

Wild horses are the one resource for which BLM has total responsibility and control, and this is the program that BLM administers that is most out of control. Can we really have faith that the BLM can solve the sage-grouse issue, which involves many more birds and more landscape, than wild horses and herd management areas, when the wild horse program is in such disarray? Our members would like to see the BLM solve the wild horse problem before taking on the sage-grouse issue.

There is the pervasive belief that more designations of ACECs will sustain and conserve sage-grouse, as well as many other species and values. However, there is no data provided that demonstrates that sage-grouse populations or habitat are any better within ACECs, than outside of these areas. Without demonstrated proof that these designations will actually improve sage-

grouse populations, any additional designations ACECs should be avoided.

The concern of this scoping process to amend the land use plans is that more regulatory mechanisms will be developed. While NOGA does not agree that more regulatory mechanisms are necessary, NOGA does recognize that more regulations will create a new demand for enforcement. Just how does the BLM plan to ensure that all these new regulations are enforced? And at what cost to the tax payers?

In closing, NOGA greatly appreciates the opportunity to submit these comments to the BLM for consideration. NOGA encourages the BLM to develop reasonable conservation measures to allow our members to continue to operate on public lands without undue hindrance while protecting environmental resources. NOGA truly believes that our activities and environmental conservation can be achieved and are not mutually exclusive actions. We look forward to BLM's appropriate response and incorporation of our comments, suggestions, and recommendations. We hope that the BLM will achieve conclusions that promote multiple-use principles, enhances conditions for sage-grouse, and has limited socio-economic impacts on our community.

Respectfully submitted,

Henry W. Krenka

President

hwk/reb