

Archived: Tuesday, February 22, 2022 2:32:45 PM

From: [Rachel Buzzetti](#)

Sent: Tue, 8 Feb 2022 21:34:20

To: [BLM_HQ_GMSG_Planning](#)

Subject: [EXTERNAL] Central Grazing Committee comments

Importance: Normal

Sensitivity: None

Attachments:

[Scoping Comments on GMSG 2-7-22.doc](#) 

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Please see attached.

Thank you,

Rachel Buzzetti

*NV State Grazing Boards Central Committee
P.O. Box 28-1251
Lamoille, NV 89828
775-738-4082*



NEVADA STATE GRAZING BOARDS CENTRAL COMMITTEE

February 7, 2022

Patricia Deibert, National Sage-grouse Coordinator (Acting)
Bureau of Land Management
440 W 200 S, Suite 500
Salt Lake City, UT 84101

Submitted via Email: [BLM HQ GRSG Planning@blm.gov](mailto:BLM_HQ_GRSG_Planning@blm.gov)

RE: Central Committee for State Grazing Boards

Scoping Comments to the Bureau of Land Management's (BLM) Notice of Intent to Amend Land Use Plans Regarding Greater Sage-grouse Conservation and Prepare Associated Environmental Impact Statements.

Dear Ms. Deibert,

The Central Committee of Nevada State Grazing Boards ("Central Committee") wishes to comment on the Notice of Intent to Amend Land Use Plans Regarding Greater Sage-grouse Conservation. The Central Committee encourages the BLM to consider these comments as Nevada's permittees have years of experience in living and operating with the Greater Sage-grouse conservation plan on the thousands of public lands.

The Central Committee was established by the Nevada Legislature and codified in the Nevada Code at NRS 568.170. Under state law, the Central Committee provides a means whereby Nevada State Grazing Boards may act together in matters of common interest as they carry out the provisions of the Nevada Code, NRS 568.010 to 568.210. The Central Committee is part of the executive branch of the Nevada State Government. The Central Committee wishes to express its concerns regarding the revisions of the Amended Land Use Plans as these changes have the potential to greatly impact public land grazing.

Update Priority Sage-grouse Habitats

Currently, the BLM and State of Nevada are not operating under the same GRSG habitat mapping in Nevada. This creates confusion and uncertainty not only for public land ranchers but also to other businesses or industries either presently operating or having interest to operate in the State. This topic has been a major issue and concern since 2015. The 2015 BLM mapping should be discarded as it does not reflect the most recent science either now or at that earlier time. This map was based on an incomplete version of the State of Nevada map. Most notably, the BLM-adopted version does not account for existing infrastructure such as highways. GRSG habitat mapping needs to be corrected during the LUPA along with a process that allows for mapping updates as new information becomes available. We believe that updates to important sage grouse habitat must be developed in close consultation with the Nevada Sagebrush Ecosystem Program.



NEVADA STATE GRAZING BOARDS CENTRAL COMMITTEE

To that end it has been well acknowledge by the BLM, the current scoping process is a broad-reaching effort that requests updated information about sage-grouse habitat threats and the updated science in each of the areas. This far reaching exercise should not seek to build an entirely new framework for Sagebrush ecosystem management.

Instead, the agency should work to create mang plans specific challenges facing conservation and management within the sagebrush biome in Nevada.

Wild Horse Grazing; threat to habitat

When identifying primary threats, grazing by wild free-roaming horses and burros on our rangelands should be considered a priority. According to a 2021 study from the U.S. Geological Survey (USGS), when horse populations are “double the established AML there is a 76% probability of sage grouse decline. This has important implications for parts of Nevada where horse populations are more than four times higher than the AML set by the BLM for that area.” Solely managed by the BLM, the horse and burro populations managed under the authorities provided in the Wild and Free-Roaming Horse and Burro Act are a direct and persistent threat to sage grouse habitat. The BLM has a fiduciary responsibility to manage landscapes for multiple use and in support of biodiversity.

Ranchers, managing their stocking rates and season of use in partnership with the BLM and other federal agencies are fulfilling their responsibilities, and there should be no correlation drawn between livestock grazing and horse populations. Federal grazing permits are subject to a variety of monitoring requirements and land health standards, which govern the season of use and can be adjusted in response to the needs of the landscape. *Many permittees* Permittees’ contributions on the federal allotments are the basis of positive conservation work in sage brush habitat; when leveraged with the additional habitat improvement on private lands, ranchers’ work protects high critical habitat that crosses broad jurisdictional boundaries. We were disappointed to see the BLM appear to draw a parallel between the two distinct issues and hope this does not indicate the BLM perceives livestock and horse grazing as comparable. Such a comparison is counter to both science and reality.

Grazing as a tool for Wildland Fire

The greatest threat to habitat loss and biodiversity in the west is catastrophic wildfire. Hundreds of millions of acres are at risk of entering or resisting in the threat of catastrophic wildfire-invasive species-habitat loss without the agency taking a more comprehensive view of landscape health that manages acres for resiliency, rather than achievements at a single point in time. To that end, restoring native grass ecosystems is crucial for long-term landscape health and resistance to succumbing to catastrophic wildfire conditions. Grazing is an effective mechanism to decrease fine fuels that contributes to the risk of catastrophic wildfire, as acknowledged by the agency during the inclusion of grazing in the targeted EA.

Predation

While we do recognize the BLM’s limitation in actively managing predator threats, we would like to request that the BLM work with the Wildlife Services Agency to implement targeted

P.O. BOX 28-1251, LAMOILLE, NV 89828

PHONE/FAX (775) 738-4082 EMAIL: RACHEL@NHDO.COM



NEVADA STATE GRAZING BOARDS CENTRAL COMMITTEE

predator management. Primary predators targeting nest sites and young bird populations include ravens and coyotes, both species experiencing population booms over the last several decades. Some estimates place the raven population explosion at nearly 800% from 1966 to the early 2000, and populations continue to flourish across greater sage-grouse habitat. The BLM should acknowledge the significant population challenges posed by aggressive nest site predation and should pursue an integrated management plan in coordination with state and federal wildlife agencies.

AMPs bring about Improved Grazing Practices

A key for achieving progress under any GRSG LUPA will largely depend on how the provided species conservation direction and guidance translate into on-the-ground actions that result in habitat improvement. One does not need to look hard to recognize that the approach implemented in 2015 has not been broadly successful in achieving this end.

Fortunately, a regulatory process exists that allows for the development of AMPs at 43 CFR 4120.2. Any modification of current grazing permits that are identified as being required for improved GRSG habitat conditions must necessarily be addressed at the allotment or ranch level and directly involve the rancher to be effective. Under this concept, the LUPA must provide incentives to encourage public land ranchers to play an active role in developing grazing practices that will have positive impacts on the bird and its habitat. It is also imperative that communication exists between agencies and landowners coordinating on-the ground practices.

The Central Committee appreciates the opportunity to be considered as a Cooperating Agency in this very important planning process. We look forward to continued involvement as this planning process is vitally important to our public land ranchers and we will look to receive further public announcements regarding this planning effort.

Sincerely,
O. Steve Boies

Chairman
osb/reb