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Subject: [EXTERNAL] 2022 Sage Grouse planning scoping comments

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Pat please accept these as my comments on the 2022 SG scoping meetings. Thanks Steve Grasty

Greetings. Thanks for make the scoping available via Zoom Jan 24. In these difficult times it's about the best we can do. I am breaking these comments into three general areas. My view of the Zoom meeting, a story to set the table for my comments and several specific scoping thoughts.

The Zoom call on Jan 24, 2022

I was disappointed to hear the response to my question regarding social impacts. The answer was the same rhetoric I heard during the 2015

planning. NEPA speaks of social AND economic impacts, the answers were an attempt to address socio-economic impacts. A term I have never understood at least to its application in NEPA planning as nowhere in NEPA is that term used. Your answer did focus on the economic impacts as a way to address social impacts. However I argue social impacts are difficult to measure through economics alone. You also gave the same old sad answer that the BLM represented all in the nation and not just the local folks and communities. I fully respect that and agree! However, never would federal agency planning, or regulations ignore impacts to a small native American population in the ways that current planning efforts ignores small rural communities. There simply is nothing that allows this double standard without realizing the social impact on those ignored. Finally, it was disheartening to hear the volume of comments and questions regarding cattle. Nothing of those comments was helpful either to sage grouse populations or to those who live and work on the ground but rather self-serving to a single perspective without offering any solutions.

As stated above it is my opinion most social impacts cannot simply be measured or addressed through economics. For any planning to be comprehensive regarding community and human populations you have to think out of the box and find a way to recognize, analyze and address social impacts. The social impacts of a planning effort MUST be included in scoping! Below is a two-part example of how SOME in rural communities are reacting to the many planning efforts on the ground for your consideration. It isn't just a sage grouse plan alone but rather it is the cumulative impact from dozens of plans that apply on a single point on the lands. During my time as Harney County Judge, I participated in numerous planning efforts of and about something affecting land within Harney County, those plans when finished were a pile over ten feet tall. And that pile was just those worked on or completed during the 18 years I was in office and just affecting land management within this single county. I want you to know that I vehemently abhor the following example, yet not addressing this type of example related social impacts ignores the worst type of outcomes. During the writing of the 2015 Sage grouse plan I spent thousands of hours trying to say how dire the results of multiple planning could be on individuals and communities and was unable to make myself heard. Those impacts truly came to a head after the completion of the plan and God forbid; may get even more dire in the future. You simply must not let this planning effort go forward without addressing the potential social impacts like those exemplified below. I fear they are too real.

The background story from a Harney County perspective.

The Bundy family has successfully taken on the federal government (with much focus on the BLM) three times. Once in Nevada, here at the Malheur Refuge and finally by continuing to graze federal lands with no fee paid. Those success stories are shared by them and their followers, a growing phenomenon in our nation. The story they tell is focused on the many regulations, laws and plans they must deal with every day to continue a generations old way of live. From their perspective they see themselves as the suppliers of the food to this nation, the guardians of freedom and the defense against what they see as heavy-handed federal regulation. At least part of their rhetoric is driven by the well-intentioned efforts of the USFS, BLM, DOI and other federal agencies. While I fully respect the need of planning and regulation, they see it as the "feds" trying to control them. No one believed something like the occupation of a national refuge could or would occur when the 2015 plan was being written but it did. Are we unwilling today to write a new plan and assume it will not add to the angst of those simply trying to survive on the landscape? To make this matter even worse today we hear these folks say that it will require violence to end what is seen as government overreach. Bundy and other have said they are prepared to take on a civil war to "fix" this problem. I hope that threat is not real but no one thought the occupation could happen only 5 years ago.

Pat and Quincy; the paragraph above seems crazy. I know it is easy to say a single planning effort will not change the social situation in a community or even broadly throughout sage grouse range or the nation as a whole. We cannot risk going through more planning or regulation building without addressing these potential and dire consequences. Moving a sage grouse plan or any other plan forward today without considering these true social impacts or the potential of them is not meeting what NEPA calls for. It may even add to risks for our entire nation. If all the users of public lands decide tomorrow that nothing can happen on "their" lands unless they approve, they completely stop following rules and guidance, they decide to stop paying fees and the BLM does nothing there will be real social impacts, the impacts to the land and wildlife will be immense and worse perhaps it will drive a situation untenable for this entire nation.

I believe there are three areas that need to have a comprehensive look at in scoping:

- Social Impact both at a local community level and broadly throughout the range.
 - impacts from a concerted effort to ignore plan requirements by users
 - impacts to a community through undermining of its social structure, intentional or consequential.
 - impacts which can drive splinter groups into the mainstream either in support of or oppose to a plan.
 - Used as an example; an analysis of how past planning affected Bundy and what can be done to prevent that type of circumstance for all into the future.
- Those efforts which successfully brought diverse groups together for planning
 - High Desert Partnership in Burns, Oregon is an example. I am sure there are others.
 - What made them work and how do we duplicate their successes
- A comprehensive look at those things that will increase sage grouse populations
 - past plans seem to plan us back to what conditions used to be. A new plan must provide options to increase the population not just suggest changing of the environment will fix the problem. Particularly in light of changed or changing conditions.

I always believed comments like this one were ineffective if they simply complained so I want to offer a thought that carries an opportunity in the planning effort. Here in Oregon, we used the Oregon Solution idea and the High desert Partnership in Harney County to set the example for planning that truly considered landscape and communities. You should review those efforts in detail, they can set the standard for national planning as easily as they did for us locally. When Bundy tried to sit down with our community and get them into his craziness, he got told by the locals that the Refuge plan was OUR plan. It was written and owned by the community working with the federal agency, USFWS, environmental groups and Ranchers. He didn't have a clue how to deal with that and moved on to other places. We handled the social impact of planning right here. You can do that type of planning on a national level but you have to get creative.

Good Luck with your planning effort.

Steven (Steve) E Grasty, Harney County Judge RETIRED

I have attached my thoughts on how one area of social impacts could be weighed.

How do we weigh the social impact of dire events occurring because of multiple and overlapping plans folks in our nation say no more!!!!????

The costs of the occupation of Malheur National Wildlife facility could be used to determine the economic cost of a repeat event and at least some of the social ones;

On a pure economic look at the cost of this social event the following should be considered

- Cost of closing down the refuge, all federal offices in Harney County and most state offices
- Cost to relocating or providing protection for key federal employees and their families
- Cost of law enforcement to local, state and federal agencies
- Cost of lodging for the various agencies who located into this community for the duration of the event
- Cost to ranching families unable to perform their necessary work during the occupation.
- Cost to the Burns Paiute Tribes archeological history disturbed or stolen at the refuge
- Cost of clean up to the Refuge
- Cost of changes to facilities and policy at the various public agencies
- Cost to agencies unable to perform necessary functions. i.e. County and State road departments

Then on a social impact analysis you could consider:

- Emotional impacts to federal employees worried about their safety
 - Emotional impacts to those in the local community impacted
 - Emotional impacts to many in the local community. An example is a school student affected by the occupation or through bullying from others supportive of the occupation. Making a comprehensive list will require considerable resources.
 - What impact did the occupation have on businesses in the community, churches or schools?
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What if things get even worse and we end up with a civil war as threatened by many associated with the occupation? While a far-out idea the risk certainly exists. This is a truly dire thought but we can no longer believe that our nation's capital won't have to deal with another insurrection as occurred Jan 6, 2021. While any one plan can't be blamed the cumulative impact of the many is at least one driving force in the angst of some. Below is a quick (probably over simplified) look at cost of a civil war

Civil War

31,000,000 people in US in 1860 332,000,000 people today

\$5.2 Billion cost for both sides to conduct the civil war..... \$174,668,000,000 in today's dollars

33.59 to 1 is the ratio of the value of the dollar between 1860 and 2021

\$167.74 was the average cost per person for the war in 1860 dollars

That would be \$5,634.39 in per person in today's dollars.

620,000 people lost their lives, this is the usually accepted number

Today we have ten times as many people as in 1860. Is it possible the casualties would be ten times the war numbers? 6,620,000!!!

I recognize these are both examples none of wish for but the last years have demonstrated a need to recognize federal agency actions have an impact some of which folks are beginning to push back at. We can do better.