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**From:** [Michelle Langsdorf](#)

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**To:** [BLM\\_HQ\\_GRSO Planning](#)

**Cc:** [CCDOWebmail](#), [BLM\\_NV](#), [BLM\\_NV\\_NVSO\\_webmail@blm.gov](#), [kmcgowan@sagebrushco.nv.gov](#), [Rachel Buzzetti](#)

**Subject:** [EXTERNAL] GRSO

**Importance:** Normal

**Sensitivity:** None

**Attachments:**

[N3 Grazing Board GRSO Scoping Comment Feb6,2022.pdf](#) 

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Hi. I'm submitting scoping comments for the GRSO Planning from N3 State Grazing Board. Thank you.

Tracey Jean Wolfe

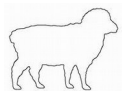
Secretary

Nevada State Grazing Board District N3

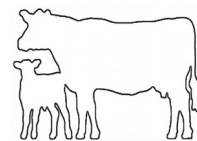
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## NEVADA STATE GRAZING BOARD DISTRICT N-3



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Richard Huntsberger, Chairman PO Box 250 Smith, NV 89430  
Tracey Jean Wolfe, Secretary 724 Day Lane, Wellington, NV 89444  
Phone (775) 901-3245 email: n3grazingboard@gmail.com

February 6, 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: Nevada N-3 State Grazing Board**  
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 [223.LLHQ230000.L11700000.P10000.LXSGCO000000]

Ms. Deibert:

The N-3 State Grazing Board (N-3 Board) is a political sub-division of the State of Nevada organized under Nevada Revised Statute 568 Grazing and Range. This Board represents the ranchers who operate on public land grazing allotments within the Carson City BLM District. As such, the above-referenced document has the potential to greatly impact the future viability of ranchers operating on public land within the Carson City BLM District.

The N-3 Board's jurisdiction includes the area represented by the Carson City BLM District, which includes portions of Washoe, Churchill, Lander, Lyon, Carson, Douglas, Mineral, and Nye County. A portion of the N-3 District is outside the Greater Sage-Grouse range, but is within the Bi-State Sage-Grouse range. The N-3 Board would like to recommend that with the next planning effort for the Greater Sage Grouse (GRSG) that the BLM take a look at the past effort that has gone on in the Bi-State Sage Grouse area. We think the Bi-State represents a good example of collaborative efforts from all interests on how to manage habitat and populations across state-lines and multiple land ownership and jurisdictions. We think there are some good examples and positive results that could be carried over to planning for the GRSG.

In Bi-State we have found that even in the small habitat range of the bird, there is a lot of habitat variability. These birds utilize habitat from the foothills of the Sierra Nevada mountains to the edge of salt-desert shrub. Any planning for the GRSG needs to consider

the variability of habitats. We find that a one-size-fit all for habitat objectives, such as Table 2.2, Habitat Objectives for GRSG, in the 2015 LUPA/Record of Decision does not accurately fit all the habitats the GRSG is found in.

The N-3 Board would like to recommend that conservation planning for the GRSG be done at a more regional level where habitat is more uniform. This could mean that planning in Nevada would be split between the west side and east side. We would like to see the BLM develop habitat goals or desired future habitat conditions and allow for flexibility in the development of GRSG habitat objectives at the appropriate scale where the site ecological status and potential can be accurately assessed and considered.

The N-3 Board supports the State of Nevada with its Greater Sage-grouse (GRSG) conservation program and plan, known as the Nevada Sagebrush Ecosystem Program. It is recommended that the Preferred Alternative resulting from any future GRSG Land Use Plan Amendment (LUPA) in Nevada include and is consistent with the existing State GRSG conservation plan. We would like to see the BLM work closely with the State wildlife agencies in this planning effort. We are concerned that while the BLM is responsible for managing wildlife habitat, other external factors can effect sage grouse populations, such as predators, which should be addressed in this planning effort as best as possible.

The N-3 Board also recommends that the BLM and grazing permittees be encouraged and empowered to develop allotment management plans (AMPs) that are designed to address identified and proven habitat conditions, concerns, or limitations that are directly influenced or affected by livestock grazing. This level of detailed planning requires the development of site-specific resource and ranch goals and monitoring objectives. This would include targeted grazing to manage hazardous fuels and outcome based grazing.

The 2019 LUPA Draft Supplemental EIS, stated that there is incomplete or unavailable information regarding the socioeconomic effects to local communities and some multiple uses such as livestock grazing. Currently the Nevada BLM has partnered with the University of Nevada, Reno (UNR), the U.S. Forest Service and counties through the Nevada Economic Assessment Project (NEAP) to create socioeconomic baseline data collection for all counties in Nevada. NEAP data includes the economic multiplier effects for local Nevada communities that result from changes in public land grazing. With this information we expect the BLM to complete a complete socioeconomic analysis, including the analysis of projected livestock grazing effects on local economies, utilizing the data compiled through NEAP.

We would like to see that no renewable energy, specifically solar and wind energy projects, be located within GRSG habitat as they are not compatible uses. There are ample areas throughout Nevada where solar and wind energy projects can be located outside of designated sage-grouse habitat. One specific example is the Dry Lake North Solar Energy Zone.

The N-3 Board appreciates the opportunity to provide the above scoping comments as part of this process. We look forward to continued involvement as this planning process is vitally important to the Board and our ranching constituents. With this in mind, please retain the N-3 Board on the agency listing for receiving further public announcements concerning this planning effort.

Thank you,

Richard Huntsberger, Chairman  
N-3 State Grazing Board

cc: Jon Raby, State Director, BLM Nevada  
Alan Shepherd, Deputy State Director for Resources, Lands and Planning, BLM Nevada  
Ken Collum, District Manager, BLM Carson City  
Kelly McGowan, Program Manager, Nevada Sagebrush Ecosystem Program  
Central Committee of Nevada State Grazing Boards