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From: [Don Henderson](#)

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To: [BLM_HQ_GRSB_Planning](#)

Cc: 'spratling55@yahoo.com'

Subject: [EXTERNAL] Nevada N-1 State Grazing Board Scoping Comments to BLM NOI to Amend LUPs Regarding Greater Sage-grouse Conservation [223.LLHQ230000.L11700000.PI0000.LXSGCO000000]

Importance: Normal

Sensitivity: None

Attachments:

[2022-02-03 Scoping Comments for GRSB LUPA N-1.pdf](#) 

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Ms. Deibert,

For your information and consideration, attached please find Scoping Comments from the Nevada N-1 State Grazing Board on the BLM NOI referenced above.

An original copy of this correspondence is being mailed to your office by Certified Mail with a Requested Return Receipt.

Please feel free to contact the Board Chairman, Craig Spratling, if you have questions concerning the attached public scoping comments or if there is an interest for obtaining further information from the Nevada N-1 State Grazing Board on this matter. Chairman Spratling's cell phone number is (775) 934-3011 and his email address is noted above. Thank you.

Respectively submitted,

Don Henderson

Certified Range Management Consultant

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February 3, 2022

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

Also submitted via Email: BLM_HQ_GRSB_Planning@blm.gov

RE: Nevada N-1 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.PI0000.LXSGCO000000]

Ms. Deibert,

The N-1 State Grazing Board (N-1 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 Elko 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 Elko BLM District.

Previous participation by this Board in both the 2015 and 2019 Nevada & Northeast California GRSB Land Use Plan Amendments (LUPAs) and participation in the Project's virtual public meetings has resulted in the following resource priorities and concerns.

Planning Level

Updates to GRSB conservation and its measures, at the minimum, must be completed at the existing LUPA level because of the variability of threats, habitat potentials, and regionalized species adaptation across the west-wide range for this keystone species. After all, site potentials in the sagebrush biome and threats to GRSB populations are much different in Nevada than in Wyoming.

The N-1 Board does not support a planning area that is any larger than the current Nevada and Northeast California planning area in the current agency review. The diversity in habitats, threats to habitat and disparate state approaches to conservation make combining planning areas cumbersome and confusing. As such, the N-1 Board recommends keeping the Nevada and Northeast California Planning Area as presently identified or simplifying the planning area to only include Nevada.

Update of 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, communities, and other existing development. GRSG habitat mapping needs to be corrected during this LUPA along with a process that allows for mapping updates as new information becomes available.

Updates to priority or important sage-grouse habitat must be developed in close consultation with the Nevada Sagebrush Ecosystem Program, the Nevada Department of Wildlife, and include local knowledge and public consultation.

ACECs are Not An Appropriate Vehicle to Bring About Sage-Grouse Conservation

Areas of Critical Environmental Concern (ACECs) are not an acceptable way to either designate or prioritize important sage-grouse habitats or to implement updated conservation measures for sage-grouse conservation. By statute, this federal land designation prioritizes one public land use or resource above other multiple uses, thereby requiring further conservation planning for that priority resource or land use.

The known threats to sage-grouse conservation in Nevada are habitat loss and fragmentation due to accelerated wildfire occurrence. This biotic and anthropogenic affect cannot be dealt with in an effective manner by using isolated ACEC designations and the development of site-specific conservation plans, because the risks from wildfire occurrence far exceeds the boundaries for priority or important sage-grouse habitats. Sage-grouse represent a keystone and landscape species. Postage-stamp sized ACECs cannot begin to adequately address the landscape level threat posed by an accelerating wildfire cycle in sage-grouse habitats.

Rather, this habitat threat requires a complete toolbox approach, including both public land grazing and public education, to implement pre-fire suppression methods and land management practices for more effective fuels management and fire risk reduction at the landscape level. Based on existing science, the N-1 Board contends that livestock grazing has an important role to play in managing wildfire fuels and reducing the occurrence and risks from wildfire in GRSG habitat.

The N-1 Board does not support designation of special areas nor ACECs as a component of this planning process. ACEC designations are not consistent with the Board's strong support for multiple use management of BLM-managed public lands, nor the State GRSG Plan.

Wildfire Management

As previously noted, the N-1 Board believes that habitat degradation and fragmentation due to accelerating wildfire occurrence is the leading threat to GRSG conservation in Nevada. The Board further contends that livestock grazing has an important and critical role to play in managing wildfire fuels and reducing the occurrence and risks from wildfire in GRSG habitat as a pre-suppression measure.

Sage-grouse Habitat Objectives or Management Criteria

Based on more recent research, including peer-reviewed research summarized by NRCS (2021), many of the GRSG habitat objectives included in Table 2.2, Habitat Objectives for GRSG, in the 2015 LUPA/ROD have been affectively discredited over the past decade. This approach was doomed for failure from the onset based on two very important and related factors: the very early status of sage-grouse research at that time and the variability of ecological site potentials and species adaptation across the range of sage-grouse habitats in the western US. The draconian and authoritative approach adopted in Table 2.2 did little to foster a climate of partnership and collaboration for the purpose of implementing proactive and voluntary species conservation measures at the habitat level.

Besides the mis-direction that was included, a primary limitation with the previous Table 2.2 GRSG habitat objectives is that they were not SMART (Specific, Measurable, Achievable, Relevant, and Trackable) per H-1601-1 – Land Use Planning Handbook. Many of the previous habitat objectives were not achievable in portions of the planning area given the variability in ecological site potentials. At the LUPA level the BLM should focus more on defining broad 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.

Use AMPs to Bring About Improved Grazing Practices, When Needed

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.

Rather than repeating this failed process, the N-1 Board recommends a different approach where grazing permittees are encouraged and empowered to take the lead in developing either new or updated allotment management plans (AMPs) that are designed, in consultation with the BLM and other appropriate parties, to address identified and proven habitat conditions, concerns, or

limitations that are directly influenced or affected by livestock grazing. This level of detailed allotment planning requires the development of site-specific resource and ranch goals and monitoring objectives.

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 and successful. Under this concept, the LUPA must provide incentives to encourage public land ranchers to step-up and facilitate the development of new or updated AMPs that result in refined grazing practices that benefits sage-grouse habitats and conservation. These incentives can and should include self-direction and initiative, targeted grazing to manage hazardous fire fuels, and outcome based grazing authorizations.

Sagebrush Focal Areas (SFAs)

The additional access, seasonal timing and other restrictions proposed for SFAs would have additive and cumulative impacts on livestock grazing operations with minimal benefit to sage-grouse. As such, the N-1 Board requests that the concept of SFAs not be included as an alternative for consideration. If the BLM does advance this concept as an alternative, then it must analyze the direct and cumulative socioeconomic impacts that would result.

Socioeconomic Analysis

Federal Land Policy and Management Act (FLPMA) and the National Environmental Protection Act (NEPA), and their implementing regulations require the BLM, to the maximum extent possible, align with and mitigate impacts to State and local government planning needs with the understanding that socioeconomic impacts are usually indirect and largely fall on rural communities. 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. This is no longer the case as 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. The N-1 Board expects the BLM to complete a robust socioeconomic analysis, including the analysis of projected livestock grazing effects on local economies, utilizing the data compiled through NEAP.

The N-1 Board appreciates the opportunity to provide the above scoping comments as part of this process. Several of the recommendations provided in this public scoping letter are unique and innovative, like the concept of rancher-driven AMPs. If further clarification is needed regarding this public scoping letter, please feel free to contact the Board Chairman identified below.

Ms. Patricia Deibert, Acting National Coordinator
N-1 State Grazing Board Public Scoping Comments
February 3, 2022
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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-1 Board on the agency listing to receive further public announcements and notices concerning this planning effort.

Sincerely,

Don Henderson (Consultant)

Craig Spratling, Chairman
N-1 State Grazing Board

/for

Referenced Information

Natural Resources Conservation Service (NRCS). 2021. A decade of science support in the sagebrush biome. United States Department of Agriculture. Working Lands for Wildlife. Washington, D.C. 32pp. <https://doi.org/10.32747/2021.7488985>.