



Nevada Farm Bureau Federation

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- Draft Version -

December 23, 2019

Nevada Wildlife Services - State Director
8775 Technology Way
Reno, NV 89521

In regard to Environmental Assessment For Predator Damage Management In Nevada

The following comment letter wishes to communicate Nevada Farm Bureau's support for moving forward with the Alternative 2, Proposed Action option outlined in the Pre-Decisional Environmental Assessment for Predator Damage Management in Nevada. Nevada Farm Bureau is a general farm/ranch organization, advocating the interests of Farm Bureau members as identified by our member-developed and member adopted public policy positions.

Nevada Farm Bureau policy states –

Predator Control – Programs:

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In order to maintain a balance between predators and wildlife/livestock, Nevada Farm Bureau should seek and support predator control.

In order to save state funds whenever possible, nongovernmental hunters should be used to control predator numbers.

USDA/APHIS/Wildlife Services should be responsible for developing Environmental Impact Statements for predator control programs on federal lands.

We ask that a more effective program be implemented for adequate predator control.

We encourage USDA and all Nevada State Grazing Boards to continue funding predator control programs.

This policy clearly indicates our organization's support for properly advancing with the Alternative # 2 and the pursuing the objectives identified in the Environmental Assessment (EA).

It is especially worth noting that through this proposed action, the appropriate response for implementing predator damage management methods will cross all land classes, especially to include the attention required for designated Wilderness and Wilderness Study Areas. Over the past several years we have been working to resolve the designations of Wilderness through county-specific land bills, which are requested through Congressional actions for moving forward with a sorting process of Wilderness Study Areas.

In these public deliberations, advocates for Wilderness designations argue that livestock grazing will be continued after Wilderness designations have been made, because of the language of the Wilderness Act which maintains authorization for livestock grazing. Our concerns over Wilderness designation have centered on experiences that while livestock grazing is continued to be authorized, land management practices (including limitations on proper resource management like predator damage management) result in an inability for viable livestock use to be continued.

We are extremely pleased to see that this critical correction is addressed with the Proposed Action that is covered in Alternative 2 of this Environmental Assessment.

From our review of this Environmental Assessment we also want to express our strongest opposition for the alternative options # 3 through # 5 as being unacceptable. None of these options, in our view, meet the needs for appropriate predator damage management or the necessary protection provided by Wildlife Services. Likewise, the objectives for integrated predator damage management are not met through any of these options (# 3 - # 5) that are detailed in the Environmental Assessment.

We strongly urge approval for Alternative 2 and timely implementation of the necessary actions to implement this very appropriate plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Bevan Lister".

Bevan Lister, President
Nevada Farm Bureau