



Nevada Farm Bureau Federation

2165 Green Vista Dr., Suite 205, Sparks, NV 89431

1-800- 992-1106 | www.nvfb.org

June 1, 2020

BLM Idaho State Office

Attention: Fuels Reduction and Rangeland Restoration Draft PEIS

1387 South Vinnell Way

Boise, ID 83709

Re: Nevada Farm Bureau Comments To Draft Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin

The Nevada Farm Bureau Federation appreciates this opportunity to offer our organization's feedback to the Draft Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin (Draft PEIS). We also wish to express our Thanks for the Bureau of Land Management's (BLM's) commitment to move forward with the enhancement and long-term function to build a resilient and resistant Great Basin system.

While a central theme of our response comes within the role that we serve as advocates for rural Nevadans in general and specifically agricultural producers (farm and ranch families) who are directly impacted by the impacts of wildfires – we also wish to stress the view we take in support of well-managed rangelands, responsibly cared for to prevent needless destruction by massive wildfire events. As has been noted by others in sharing their perspectives, there is nothing natural about the mega-fires we have experienced over the recent number of years and it is imperative that the BLM adopt proactive strategies that work to preclude the expansive loss of working rangelands to the cycle of wildfire and expansion of invasive grasses like cheatgrass or worse.

Wildfire Protection And Reduced Fuels Critical:

Nevada Farm Bureau recognizes the wildfire situation in our state has been the number 1 issue in need of appropriate attention with regard to management of federally-managed lands in our state. The lack of sufficient attention and proper focus on fuels management has resulted in devastating, uncontrollable wildfires. Farm Bureau members have been directly impacted by the losses connected to these massive and far too frequent wildfire instances.

The connection for considering this Draft PEIS in recognition of complying with Executive Order 13855 and Secretarial Order 3372 is noted and we appreciate the high level of priority this response is offering to carry out these directives. We also support the attention given to implementation of the objectives for fuels reduction and rangeland restoration as necessary for meaningful habitat management actions for the benefit of Sage Grouse and other sagebrush dependent species.

In the words of the Draft PEIS... ***“An estimated 17 million acres in the Great Basin are currently dominated by the invasive annual grass cheatgrass and it has established itself as a component of the broader plant community in an additional 62 million acres.”***

Managed Livestock Grazing An Effective Tool:

Nevada Farm Bureau policy notes that livestock grazing can be an effective tool in addressing a necessary reduction in fine fuel loads and we are pleased to see targeted grazing is included as an option in the range of methods that are available.

We wish to stress that not only should livestock grazing be included as a tool for reduction of fine fuels in a pre-fire suppression strategy, but also should be incorporated into a post-fire restoration system.

Within areas targeted for fuels reduction projects, suspended livestock Animal Unit Months (AUMs) should be restored with an emphasis of also increasing flexibility for stocking rates and season of use to provide the opportunity for livestock grazing to be used for fine fuel reduction. Research and demonstrated projects by the University of Nevada, Reno have shown that livestock grazing practices during non-growing seasons can be tremendously effective in reducing cheatgrass dominated sites while not affecting desired grasses.

As livestock grazing is taken into account for advancing restoration activities we want to emphasize the necessity for consultation and coordination with the permittee to determine the best option for their livestock grazing allotments and permits. The Draft PEIS makes note in a couple of areas for how voluntary agreements and other adjustments to authorized livestock use will be taken into account (section 2.2.4 and footnote 2 on page 3-1 of the Draft PEIS).

In this recognition, we urge that livestock allotment owners need to be given full and meaningful consideration for necessary adjustments to modification of management plans. Restoration activities and post-restoration management should not (as examples from the past have demonstrated) result in long-term removal or reductions of livestock grazing as piece-meal projects are carried out over multiple years.

We are aware of a proposed rewrite, offered by the Idaho Farm Bureau Federation, to take into account concerns regarding changes for allotment management plans and are in agreement with this type of change. The appropriate rewrite of the language in section 2.2.4 (page 2-3 of the Draft PEIS) should state: (underlined wording added and ~~crossed-out language deleted~~) **“If any changes to existing Allotment Management Plans or current grazing practices are necessary to support the success of a restoration project, ~~However,~~ the BLM ~~may~~ will work with permittees, only through voluntary agreements ~~or~~ after careful and considered coordination with the permittees and within the authorized permitted use to temporarily modify grazing in a way that will not accrue additional expenses to the permittee, to increase the vegetation restoration projects.”**

Further in regard to livestock grazing as a tool for fuels reduction and restoration – we note that in the **Table 4-8 on page 4-99** lists the estimated cost of various treatment methods proposed to be used. Unfortunately, perhaps as an oversight, **“Targeted grazing” is not included** with the information provided by the chart. We believe that there will be costs to targeted grazing (examples such as more intensive management, possibly temporary fencing, hauling of water, or other measures to ensure the livestock stay in the area to be targeted). While it is likely that the current allotment owner will be involved in carrying out the targeted grazing, these additional costs should be expected to be paid by the livestock owner. In some instances, other livestock producers may need to be brought to the project areas to complete the targeted grazing, if for instance, the current permittee only has cattle, while the targeted grazing plan calls for sheep to accomplish the results desired. The chart should adequately cover the costs for Targeted grazing.

Preferred Alternative “B” Appropriate – to a point:

In general terms, Nevada Farm Bureau supports the Preferred Alternative – Alternative B. We see the many advantages of BLM using the full suite of methods to restore rangelands on the scale and scope that this proposal provides. We agree strongly with the contention that “the flexibility to use multiple treatment methods improves opportunities to use appropriate treatments based on a given vegetative state...”

We would caution and depending on circumstances adamantly object to any obsession with limiting restoration treatments to the use of native plant species only. It is noted that in areas where successful restoration is unlikely, restoration treatments could be improved using nonnative vegetation species to stabilize sites.

Restoration has proven largely ineffective to exclusively use native species for rehabilitation. Fire-resistant crested wheat grass and other non-native species such as forage Kochia provide a multiple range of benefits, including a stronger protection from invasive species.

Focus On Fuel Management Needs To Be Top Priority:

The Introduction for the Executive Summary notes that *“Standalone fuels reduction projects tend to be short lived and/or require regular maintenance unless combined with restoration efforts.”*

The contention is then followed with the context that *“to promote long term improvements in vegetation communities, fuels reduction treatments will be considered as a component of restoration projects.”*

We are not in complete disagreement with this premise but wish to strongly stress that fuels reduction treatment needs to be given the highest priority. By the language of the Purpose and Need section of the Executive Summary it is noted – *“Intact sagebrush communities are disappearing within the Great Basin due to the interactions of increased wildfires, the spread of invasive annual grasses and the encroachment of pinyon-juniper. Restoration treatments such as fuels reduction and revegetation are needed to retain and increase intact sagebrush communities and improve their ability to resist annual grass invasion and recover from disturbance such as wildfire.”*

Against this foundation of understanding it is troubling to see 28 identified projects located in the Appendix N, titled as “Potential Treatment Areas and Acres from the FIAT Assessments” where “removal of crested wheat” or “establish natives in crested stands” and similar variations are identified. Two-thirds of these 28 projects (19) are classified as “High” priority for implementation.

There may be instances when advancement of restoration could incorporate these types of projects of enhancing crested wheat areas to build on sagebrush or supplement the area with other native species. Given the serious nature of more pressing matters, concentrating on dealing with the *“estimated 17 million acres in the Great Basin... currently dominated by the invasive annual grass cheatgrass”* and giving proper attention to areas where... *“it has established itself as a component of the broader plant community in an additional 62 million acres.”* – we can’t help but caution against the misguided philosophy of using “restoration” as cover for something other than protection and enhancement of legitimate priorities.

If tearing out crested wheat seeded areas is going to be the excuse for “restoration” we believe that it should be imperative to not impair or reduced allocated forage that is linked to livestock grazing Animal Unit Months (AUMs).

Even more critical these proposed “restoration” projects should only be advanced forward through implementation where our present scientific understanding and technology/resources can insure success. Tearing out crested wheat seedlings to only achieve more invasive and expanded cheatgrass monocultures, under the guise of a range philosophy of native purity seems to be a misplaced concept.

The Necessity Of Coordinating With Local Resource Management Plans:

We understand that one of the major advantages of the Draft Programmatic EIS centers on the streamline analysis and implementation of future site-specific restoration projects. We also are in agreement with those who advance the importance of BLM working cooperatively in a coordinated fashion with county governments to consider local natural resource plans and goals in restoration activities, especially with projects that don’t require a full-fledged National Environmental Policy Act (NEPA).

In Summary:

We greatly appreciate having the Draft PEIS for Fuels Reduction and Rangeland Restoration prepared in order for attention and action by the BLM to move forward with improved resource management in the Great Basin. For too long non-management or the attitude of leaving nature take her course has resulted in devastating conditions. Proactive management is essential to improve resistance and resiliency in our working Great Basin rangelands.

With attention given and practiced for cooperative consultation and coordination, involving livestock allotment owners and local government partners, we believe good results are possible. We look forward to that being accomplished.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bevan Lister".

Bevan Lister,
President