

Prescript:

Dear Mr. Rubald,

Apologies for the last minute letter. I am just emerging from the pain med haze of neck surgery last week. I have not been able to look at your meeting materials until today. Further apologies for the primitive typing and letter format. I cannot bend my neck to use my computer and am typing this on a mini iPad propped up on my knees -- frustrating at best.

11/17/13

To the Sagebrush Ecosystem Council

From Karen Boeger, NV Chapter Backcountry Hunters and Anglers\*

\* BHA advocates for conservation and restoration of the "backcountry": big, wild, unfragmented wildlife habitat =

The best habitat for wildlife, fish and traditional hunters and anglers.

Comments on proposed BMPs:

Fuels management, p 7:

1. Re use of livestock grazing as a tool, ADD: only with use of intensive management. (Timing is everything. Without daily monitoring and management oversight, the situation could be worsened rather than improved.)
2. ADD: any treatment project must include a post treatment management plan, timely monitoring and implementation of adaptive management when indicated by monitoring.

Fire management, p8:

1. WSAs and Wilderness areas must have site specific management plans

ROWs, p 10:

1. Re reclamation of project roads for commercial access, unless specific benefits for public access: ADD: not if within SGMA. No new roads.

Travel & transportation, p 11

1. Re public safety exception to no upgrading provision: beware. This can have the opposite effect as speeds will increase with increased standard. A "difficult" road can actually increase safety by forcing appropriate speed and increasing caution. Note 1 BMP suggests water bars to decrease speeds.
2. Re evaluation of impacts of existing routes to leks and SG winter range: ADD: if impacts are unacceptable level, adaptive management action will be taken, including closing routes entirely or seasonally.
3. Re seasonal closure to avoid degradation of habitat, ADD: and or to avoid disturbance during critical times. ADD: provision to entirely close routes in priority habitat when deemed best long term benefit to SG.

4. ADD: BLM & FS must prioritize route designation in SGMAs and travel be restricted to designated routes. Where route designation process already completed, a new look must be taken with SG habitat health given higher priority and revisions made where appropriate.

Riparian areas & wetlands, p 12

1. ADD: timely monitoring, followed by adaptive management action where indicated. If not at PFC,. Management plan must assure trend will be upward and consequences for downward trend.

Livestock grazing and management, p 12, 13

1. See # 1 above

2. Consequences for unmet utilization standards have been removed. What assurance for adaptive management changes on a timely basis (6 mos - 1 yr) ?

3. Often a change of season of use can reduce existing impacts, is this practice a part of the NRCS/NDOW standards?

4. Have the standards and guides developed years ago by the No. NV and E NV RACs been incorporated into the NRCS/NDOW standards?

Thank you for consideration of these comments.