

January 5, 2014

To the Sagebrush Ecosystem Council
Re: Grazing comments for consideration

From Karen Boeger
NV Chapter, Backcountry Hunters and Anglers

Dear Council members,

I have been concerned to date by the lack of discussion and/or proactive ideas regarding grazing management and it's inter-relationship with sage grouse (SG) habitat. I was reassured to see that this will be a main topic of conversation at your meeting this week and that of the Science Team as well. I appreciate your openness to public comment and am thus sending you a list of my thoughts for your consideration.

A. My first comment re: grazing and SG habitat has nothing to do with ideas for inclusion in the EIS, rather it is to speak to ranchers themselves.

I have been lucky in my life of conservation activism to have met and learned from many progressive ranchers, several of them in my own family. I believe that they know what BMPs need to be applied throughout sage grouse management areas (SGMAs) to restore or retain land health, priority areas in particular. I believe that many of them even know where the problem allotments are within those areas. I am pinning my hopes on them to take this bull by the horns and kick into action with pro-active ideas now/today, perhaps in the guise of the NV Cattlemans Association (NCA) and/or in stewardship groups within SGMAs.

Among the ag industry there is a wide spread (tho' not universal) resentment of the "feds" big brother role in their lives as regards use and management of the public lands. To my mind, lack of pro-action by many stakeholders often places the agencies in that role. Instead we wait through the time-consuming process of studies and monitoring, followed by direction from the agencies. It is my hope that progressive ranchers will find a way ASAP/now to nudge their cohorts into becoming proactive, rather than reactive. Coming from rural roots, I realize that there is a respectful cultural tendency to not tell our "neighbors" (peers) what to do, let alone how to do it. At the moment, the best that can be hoped for is to lead by example, but some of those same leaders are scoffed at by those who resist change and/or do not have faith in its benefits.

Thus, it is my fervent hope that progressive ranchers (and there is one sitting on this council) will band together now to devise incentives to lead reluctant peers into implementing BMPs and other positive management actions on those allotments within SGMAs needing SG habitat stabilization and/or restoration. I further believe that this will lead to a sustainable ranching industry over time. We (and SG) will all benefit from that.

I suggest the need for the public land agencies to play the role of "big brother" will lessen if:
The NV Cattlemans Association (NCA) produce ASAP a proactive SGMA adaptive management grazing plan including:

1. Present NV models of sustainable grazing, including riparian in PFC and forb diversity, within high priority SG habitat with healthy SG #s.
2. Highlight those models in the media across the state, both for public education and "reluctant rancher" education.
3. Devise an incentive program for SGMA permittees to replicate grazing management of those models.
4. A peer enforcement plan for sustainable management, such as a monitoring team with both agency and NCA reps.
5. Team to remove unused/unnecessary fencing, remove or relocate water developments with negative impact in SGMA.
6. Establish stewardship groups within each SGMA, especially the priority areas.
7. Ensure each permittee in SGMAs has attended the NCA workshops on low stress herding (which should result in less pressure on riparians).
8. Devise a plan for assistance to small family ranchers to implement BMPs where/when appropriate as sustainable grazing practices likely will cause some loss of short term profit. The large corporate ranches are more capable of absorbing those losses. This is a major reason for the loss of our small family ranchers.
9. Set up a meeting with Temple Grandin when she comes to Elko at the end of this month. Encourage her of the necessity and value of a campaign for humane dispatchment of excess, unadoptable wild horse/burros (WHB) modeled on her work with cattle. If she were the spokesperson, it may turn a critical mass of public opinion in that direction.

B. The following is my outline of thoughts re: proactive grazing management strategies

Concepts:

1. Properly managed, sustainable grazing can be good for sage grouse(SG), while improper can result in negative impacts.
2. Healthy SG habitat is also sustainable grazing habitat, thus good for ranchers over the long term, but recognize potential loss of short term profit.

Management action re: WHB must be simultaneous with implementation of grazing management actions re: SG.

Re-evaluate herd management levels (HML) in all SGMAs for capability/ suitability based on current habitat health. Reset HML where indicated.

Prioritize and expedite gathers in high priority SG habitat , then within the greater SGMAs.

Gather to low HML. Initiate gathers once numbers exceed high end of HML. Monitor numbers annually in SGMAs.

WHB groups/advocates should contribute to cost of WHB management, similar to the way sportsmen pay the costs of wildlife management.

Give high priority to funding and completing rigorous/credible studies to ascertain effective grazing management strategies in SGMAs re:

1. Effects of various types of grazing systems/season of use on SG habitat.
2. Effects of grazing SG habitat after fire (WHB grazing must be factored in as well).
3. Cost/effectiveness of livestock as cheatgrass reduction tool on a large scale. Determine intensity level of management required to avoid negative impacts. Until such studies are complete, no use of livestock for such a purpose without certainty of close, daily intensive management.

Re-evaluate all grazing management plans in SGMAs, prioritizing those in highest priority SG areas. (Can't use "priority" too much, can we?)

Evaluate allotments in SGMAs for capability/suitability, riparian PFC and forb diversity. Apply the site-specific consultation based design features where applicable.

Shorten permit renewal times for allotments in SGMAs.

Or tie permit renewal frequency to habitat/riparian health assessments: those in good health or continued upward trend = longer renewal period

Same thought for grazing (adaptive) management assessment: once a year for those in good health or upward trend, biannual for downward trend.

In priority areas within SGMAs, there should be no new range developments (fences, roads, spring developments) unless it can be assured to result in a net positive, rather than negative, effect on SG and SG habitat.

Increase appropriation \$ for range cons in districts with SGMAs.

Prioritize and increase monitoring in high priority areas of SGMAs, then remaining area of SGMAs.

Set measurable standards for upland and riparian.

Allow permittee to monitor, with random spot check by agency, if in healthy or upward trend allotment, immediate adaptive management action if trend in downward direction.

In SGMA allotments with riparian below PFC and/or low forb diversity:

Immediate application of adaptive management, coupled with more frequent monitoring.

Revise grazing management plans (GMPs) to utilize best management practices (BMPs) for upward trend.

Firm consequences (rest, reduction of numbers?) for not achieving an upward trend.

At minimum, review GMPs annually for progress, bi-annually for downward trend.

Consider BMPs submitted by Sherm Swanson to Winn. BLM for their Resource Management Plan Revision as a good template for sustainable use and adaptive management strategies.

Find NV models of successful sustainable grazing coexisting with healthy numbers of SG, as the Deseret Ranch is for UT.

Replicate their management practices where appropriate.

C. Concluding essay:

While I am a board member of the NV Chapter of Backcountry Hunters and Anglers, I cannot claim to speak for them or the national BHA organization. I have the bad habit of commenting at the last minute without the gift of time to send it to BHA for review. I choose to think my grey hair gives me some leeway. What I can say is that my comments are supportive of our BHA mission: conservation and restoration of large chunks of healthy unfragmented wildland habitat. This is the habitat where both wildlife and traditional hunter/fishers thrive.

I am no scientist or wildlife biologist, but the ideas and opinions I stated above are the reflection of well over half century of observations out on the public lands throughout NV, the gift of wisdom bestowed by friends and family more experienced and knowledgeable than I, by attending various grazing/riparian workshops and field trips and participating for decades in various stakeholder groups throughout No. NV. For over 20 years, I accompanied my husband, Dan Heinz (deceased), on his many expeditions to monitor and document various grazing allotments, and later review his comments to the agencies. Having had a career in the FS managing numerous ranger districts around the west and the allotments within them, Dan had a wealth of knowledge and experience of which I hope even a portion has rubbed off on me. Over the years, we were grateful for the insights gained through respectful relationships developed with progressive NV ranchers (and a few prickly relationships with others, it must be confessed), who are our hope for the future.

Although I am not a rancher, well over half of my immediate and extended family are aggies of one kind or another, including livestock grazing on public lands. In addition, for 20 years, Dan and I lived on our 70 acre remote homestead in the Pahrash mountains working to restore a degraded riparian and sadly witnessing the continued degradation of the creek and springs outside our fence (due to both cows and horses and not enough cowboys), coupled with the gradual decline and disappearance of the SG in our "neighborhood". I have a vested interest, but also strong belief, in the need to keep ranching (especially the small family ranchers) viable on our public lands where appropriate and in a sustainable manner that ensures survival into the future. The ranching tradition is a part of our western heritage and culture that enriches our lives and imaginations.

I believe, as many ranchers have stated, that overgrazing did indeed spur SG populations for a period of time, but also that over time had a seriously negative effect. This includes the negative effect of phenomenon we (and SG) still suffer greatly from: suppression of fire due to lack of fuels, cheatgrass invasions when fire does occur due in large part to grazing pressure reducing resiliency and/or existence of natives, PJ invasion when water table lowered with incising of riparians primarily due to elimination of shrubs holding the banks in place followed by storm events. Thus, I cannot support more intensive grazing as a solution until critical rigorous studies demonstrate this can happen on a landscape scale with a minimum of management expense. I'm all for full employment of cowboys, but not to increase grazing intensity, rather, by daily management and movement of livestock, to begin the restoration of what damage we have done over time.

We may never be able to bring SG populations back; a rational argument could be made that perhaps it's a misplaced goal or priority. That said, I cannot condone business as usual, not solely because of the SG, but because our use of the public land has been far beyond sustainable over much of NV and the west. **Sustainable public land health should be our priority goal.** To my mind, the SG is the canary in the mine telling us that we've seriously tipped over a line from which we may never recover, but are obligated to try our darndest to fix for future generations as it was given to us in trust. **Healthy habitat is good for everything out there, whether wildlife, ranchers, hunters, recreationists.** Mining is likely the only multiple use that does not have a stake in the condition of the land. I sincerely hope we can avoid a listing, but the threat alone has brought our focused attention to a serious problem. My belief in the value of the ESA and the effort to retain diversity by stabilizing SG populations is not just for the critters per se, but because the threat of a listing is the only legal tool we have right now to jerk us up short and say hey we've been abusing the habitat, our public trust, often for short term profit. I view **public land health and species diversity as the savings account for all of our generations to come.** Within our own generation we have already squandered a huge portion of that savings. It's our responsibility to try to our very best to restore what we can of that public land health and public trust as we've each played a part in the loss.

With thanks or your consideration of my lengthy comments,

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