

V. CAUSAL FACTOR ANALYSIS AND MANAGEMENT RECOMMENDATIONS

The Local AMRTs are tasked with completing a causal factor analysis and provide management recommendations associated with each population or habitat trigger. The results from this process are provided below in a *Causal Factor* table for each Conservation Planning Area.

5.4 SANE CONSERVATION PLANNING AREA (POINT OF CONTACT – ROBIN BOIES)

Category	AMRT Management Recommendations	Agency Response
		<p><i>Please list appropriate, realistic, and targeted responses for each causal factor. Please limit/prioritize to a maximum of 5 actions per/PMU. Actions need not be restricted to federal agencies (i.e., BLM/Forest Service), they may involve other governmental organizations (e.g., NDOW, County, State, etc.). Please identify which agencies the recommendations are meant for.</i></p>
General	<p>The SANE group recommends the completion of the O’Neil Basin PPA EA and that it be given the highest priority within BLM planning. There are 25 SANE projects within the O’Neil PPPA that address threats to sage grouse. The SANE group recommends the approval and use of a programmatic EA for targeted grazing, asks that flexibility be included in permit renewals, and recommends the use of Great Basin fire tactics in wildland firefighting. SANE recommends the continued support of the SANE volunteer fire team with equipment, training, and funding. SANE supports repositioning of equipment and increasing locally led initial attack on small fires. SANE asks for increased support from the BLM and Forest Service to use grazing as a tool to reduce fine fuel loads in high moisture years. (BLM, USFS)</p>	<p>USFS Response: The HTNF is currently preparing an Environmental Assessment for invasive plant treatments on all HTNF lands in Nevada. This EA includes the use of targeted grazing treatments on invasive plant species. This EA and existing categorical exclusions should be sufficient for the Forest Service to implement targeted grazing treatments. Once the EA is completed, any targeted grazing treatment area that requires construction of new fences, water developments or other infrastructure will likely require additional site specific analysis under NEPA.</p> <p>USFS Response: Flexibility is a key component of all of the Forest’s on-going grazing reauthorization projects and, as far back as 2012, the Forest has incorporated flexibility into every completed project. As we have progressed, we continue to learn how to improve management flexibility in our grazing reauthorization projects. The specific needs of each project vary but expanded seasons of use and allowing variability in stocking rates</p>

have been a key component of each project and allow the District Range Specialists and permittees greater flexibility in responding to changing conditions on the allotments.

USFS Response: Most federal firefighters in Nevada have Great Basin experience and expertise. They utilize sound strategy and tactics when engaging in initial attack of a fire and also during extended attack. Where feasible and safe to do so, our firefighters coordinate and work with local ranchers and cooperators during fire suppression. If a fire resource doesn't have Great Basin expertise/experience, they are paired up with a similar resource that does. During the 2019 wildfire season, the Humboldt-Toiyabe National Forest launched its rancher liaison program to share information and utilize local knowledge during fire suppression operations. This program has been well received by both federal resources and private landowners.

USFS Response: The Humboldt-Toiyabe National Forest has forest plan direction regarding repositioning suppression resources in the 2015 Greater Sage Grouse Plan Amendment:

GRSG-FM-GL-063-Guideline On critical fire weather days, protection of greater sage-grouse habitat should receive high consideration, along with other high values, for positioning of resources.

GRSG-FM-GL-064-Guideline – Line officers should be involved in setting pre-season wildfire response priorities and, prioritizing protection of priority and general habitat management areas and sagebrush focal areas, along with other high values. During periods of multiple fires or limited resource availability fire management organizational structure (local, regional, national) will prioritize fires and allocation of resources in which sage grouse habitat is a consideration along with other high values.

During wildfire season, the Forest Service coordinates regularly with the other fire agencies to monitor conditions and reposition resources to protect sage grouse habitat and other high resource values. Local

cooperators talk on a weekly or daily basis when conditions warrant and share information with fire management staff at the state and local level to assist in identifying where additional initial attack resources may be needed.

Data used in determining whether conditions warrant repositioning resources include the fuel moisture database, energy release components obtained from local Remote Area Weather Stations, the National Interagency Fire Center's predictive services outlook for the Great Basin (7-day and monthly), the U.S. Drought Monitor for Nevada, and information about events that could result in wildfire starts, such as Fourth of July celebrations, large public gatherings or a critical fire weather event (lightning, wind event, high Haines index). Regional and national preparedness levels affect the availability of resources for repositioning.

Sage grouse habitat maps are loaded into the Computer Automated Dispatch system, allowing interagency dispatch to determine when a fire start may potentially threaten sage grouse habitat. Initial attack crews verify this information when they arrive on site, and employ appropriate suppression tactics.

USFS Response: The Forest Service participates in interagency dispatch with the BLM and the Nevada Division of Forestry, assigning the closest available resources for initial attack. Local fire agencies are dispatched through 911. The number one priority of the Forest Service is firefighter and public safety. Individuals participating in either initial or extended attack on National Forest System lands must be part of an organized response, and have appropriate training, personal protective equipment and communications, for their own safety and that of other responders. The Forest Service supports our volunteer fire departments and rangeland fire protection associations and encourages participation in wildland fire response through these organization

USFS Response: In 2017, the Forest Service released handbook direction which allows for extensions of grazing seasons in high moisture years and for other reasons. While this direction only allows for a 2 week increase in season of use, this provides substantially more flexibility than we previously had. As of the end of the 2019 grazing season, the HTNF has approved every request for an extension of grazing seasons.

In environmental analyses for grazing reauthorization projects, both ongoing and the last two completed projects, the HTNF is incorporating additional flexibilities such as expanded seasons of use to better respond to annual fluctuations in forage production or invasive annual grass production.

BLM-NV Response:

The O'Neil Basin Project Planning Area (PPA) Environmental Assessment ([DOI-BLM-NV-E030-2016-0012-EA](#)) is currently paused.

The Targeted Grazing EA ([DOI-BLM-NV-0000-2019-0003-EA](#)) will be available for use before the end of FY2020.

Great Basin wildland firefighting tactics are being used.

BLM Nevada Wildfire Program Partnerships

- Work with State/Federal Wildland Fire partners to expand programs
- Continue to provide Wildland fire training and build and maintain effective relationships with interagency partners including City, County, Rural Fire Protection Associations, Volunteer Fire Departments, Utilities and other non-governmental organization

Nevada Department of Forestry Response:

NDF will work with Elko County Fire Department to make sure the VFA grant and application process is shared in a timely manner.

<p><u>Gollaheer PMU Habitat Trigger:</u> Multiple wildfires in 2018 (1), 2017 (2), 2016 (1) have contributed to habitat declines (200,000 acres) Fires - Goose Cr (63,924 NV ac), Dry Gulch (55,328 ac), Delano (15,264 ac), Piney (1,596 ac)</p>		
Fuels Management	<ol style="list-style-type: none"> Complete the O'Neil PPA EA so that the 353 miles of fuel breaks identified across the entire SANE area can be implemented to help fight large fires. (BLM) 	<p><u>BLM-NV Response:</u> The O'Neil Basin Project Planning Area (PPA) Environmental Assessment (DOI-BLM-NV-E030-2016-0012-EA) is currently paused. However, the Programmatic EIS for Fuel Breaks in the Great Basin (DOI-BLM-ID-0000-2017-0001-EIS) had been completed and is available for use.</p>
Vegetation Management	<ol style="list-style-type: none"> Complete the O'Neil PPA EA so that the 12 restoration polygons totaling 102,000 acres can be addressed (BLM) Complete the O'Neil PPA EA so that the 15 conifer removal polygons totaling 347,000 acres can be accomplished. (BLM) 	<p><u>BLM-NV Responses:</u> 1. The O'Neil Basin Project Planning Area (PPA) Environmental Assessment (DOI-BLM-NV-E030-2016-0012-EA) is currently paused. However, the <i>Programmatic EIS for Fuels Reduction and Rangeland Restoration in the Great Basin</i> (DOI-BLM-ID-0000-2017-0003-EIS) will be available for use before September 2020. 2. The O'Neil Basin Project Planning Area (PPA) Environmental Assessment (DOI-BLM-NV-E030-2016-0012-EA) is currently paused. However, by June 1, 2020, a categorical exclusion (CX) for the BLM as directed by the amendment of the Healthy Forests Restoration Act (HFRA) of 2003 by the Agriculture Improvement Act of 2018 for covered vegetation management activities carried out to protect, restore, or improve habitat for greater sage-grouse or mule deer will be available for use by the field offices. The CX includes manual, mechanical, chemical, some fire, and targeted grazing techniques up to 4,500 acres.</p>
<p><u>Gollaheer PMU Population Trigger:</u> Lek Cluster Soft Trigger; Extreme western corner of PMU. None of the leks identified in the PMU contributed to the cluster hitting a soft trigger, recommend trigger removal</p>		
<p><u>Islands PMU Population Trigger:</u> Lek Cluster Soft Trigger: S.E. border of PMU. None of the leks identified in the PMU contributed to the cluster hitting a soft trigger, recommend trigger removal</p>		
<p><u>O'Neil Basin PMU Population Trigger:</u> Lek Cluster Soft Trigger: Northern portion of PMU</p>		
Invasive Weeds	<ol style="list-style-type: none"> Create a weed inventory (SETT, NDA) 	<p><u>BLM-NV Response:</u></p>

		<p>Consider submitting a proposal for the weed inventory as part of this process next year. Provide location (map), a description of the proposed project, possible partners (?), and the deliverable.</p> <p><u>Nevada Department of Agriculture and SETT Response:</u></p> <p>The Nevada Department of Agriculture has location data available for listed noxious weed species through eddmaps.org and is engaged in collecting and providing more data continually. Noxious weed distribution maps are being created and will be provided on the Department of Agriculture website in 2020. Staff from the Department of Agriculture and the Sagebrush Technical Team are coordinating this effort.</p>
Fuels Management	<ol style="list-style-type: none"> 1. Implement prescribed burns in stringer meadows (<u>NDF</u>) 	<p><u>BLM-NV Response:</u></p> <p>Consider submitting a proposal for this project as part of this process next year. Provide location (map), a description of the proposed project, possible partners (NDF?).</p> <p>It is possible that the NEPA could be covered by use of this new CX: by June 1, 2020, a categorical exclusion (CX) for the BLM as directed by the amendment of the Healthy Forests Restoration Act (HFRA) of 2003 by the Agriculture Improvement Act of 2018 for covered vegetation management activities carried out to protect, restore, or improve habitat for greater sage-grouse or mule deer will be available for use by the field offices. The CX includes manual, mechanical, chemical, some fire, and targeted grazing techniques up to 4,500 acres.</p>
Range Management	<ol style="list-style-type: none"> 1. Complete NEPA and Implement EA for HV-11 (<u>BLM, WELLS-FO</u>) <p>The following projects are recommended in order of highest priority to lowest:</p> <ol style="list-style-type: none"> 1. Complete NEPA and Implement CA-5* (<u>BLM, WELLS-FO</u>) 2. Complete NEPA and Implement CA-2* (<u>BLM, WELLS-FO</u>) 3. Complete NEPA and Implement CW2* (<u>BLM, WELLS-FO</u>) 	<p><u>BLM-NV Responses:</u></p> <p>NEPA is needed for the all projects identified here. The Mary's River Complex EA is not in ePlanning so status of that EA is unknown.</p> <p>Are the wildlife biologists and the Field Manager in the BLM Wells FO aware of the SANE Sagebrush Ecosystem Conservation Plan? A lot of work went into this document. Are there locations/maps for each of these projects? If any of these projects are suitable for partners</p>

	<ol style="list-style-type: none"> 4. Complete NEPA and Implement Y3-13, Y3-10, Y3-9* <u>(BLM, WELLS-FO)</u> 5. Finish Mary's River Complex EA <u>(BLM, WELLS-FO)</u> 	<p>(implementation, purchase supplies (cattleguard) etc.), it should be identified next year when submitting this document.</p> <p>HV-11 = relocate fence away from lek /rebuild fence to reduce collision risk, CA-5= Mudhole Spring Protection / protect springhead from livestock grazing using Liberty pipe fence, CA-2 = Make existing temporary fire fence permanent / improve cattle distribution, CW-2, Create Chicken Springs Riparian Pasture / cattleguard needed on County Road. Y3-13, Bear Creek Rhone Cattle Guard / Install Cattle Guard to reduce unintended cattle movement. Y3-10, Fatal Springs East Cattle Guard / Install cattle guard to reduce unintended cattle movement Y3-9, Fatal Springs West Cattle Guard / Install Cattle Guard to reduce unintended cattle movement.</p>
Wildlife Management	<ol style="list-style-type: none"> 1. Increase Raven predator control <u>(USDA APHIS Wildlife Services, NDOW)</u> 	
Misc	<ol style="list-style-type: none"> 1. Support Winecup-Gamble pilot projects and research <u>(UNR, USGS, Legislative Natural Resource Committee)</u> 2. Increase Staff in Elko NRCS office for conservation planning <u>(NRCS, NVACD)</u> 	<p><u>NRCS Response:</u></p> <p>Through our partnership with NVACD, NRCS supports the NEECD in their plans to add staff that would be located in the Elko County. A position recently advertised and was to close March 30th, 2020.</p> <p><u>BLM-NV Response:</u></p> <p>Outcome Based Grazing: Overall the program is looking at issuing larger guidance for flexibility and revised AMP guidance within calendar year 2020.</p> <p>Intermountain West Joint Venture has started an informational site on Outcome Based Grazing Authorizations. This site has a great short bio for each permittee involved and is available at:</p>

		https://www.partnersinthesage.com/blog/obga-meet-the-participating-ranches Winecup Gamble project (Elko District, Wells FO) is in the final stages of finishing their Rangeland Health Evaluation. They anticipate issuing a fully processed permit in FY21.
<p><i><u>Snake PMU Population Trigger:</u></i> Lek Cluster Soft Trigger N.W. corner of PMU. Lek Soft Trigger – East Antelope Peak Lek East Antelope Peak Lek is less than one mile from East Hubbard Lek. Some years and/or individual lek counts may be up or down, but the total number of birds added together has remained consistent. The soft trigger on East Antelope Lek is not valid.</p>		
Range Management	1. Complete NEPA and Implement HV-7* (<u>BLM, WELLS-FO</u>)	BLM-NV Response: Unclear as to what HV-7* is. It is not referred to in the SANE Sagebrush Ecosystem Conservation Plan . NEPA is needed for this project
Wildlife Management	1. Increase Raven predator control (<u>USDA APHIS Wildlife Services, NDOW</u>)	
Misc	2. Support Winecup-Gamble pilot projects and research (<u>UNR, USGS, Legislative Natural Resource committee</u>)	BLM-NV Response: Outcome Based Grazing: Overall the program is looking at issuing larger guidance for flexibility and revised AMP guidance within calendar year 2020. Intermountain West Joint Venture has started an informational site on Outcome Based Grazing Authorizations. This site has a great short bio for each permittee involved and is available at: https://www.partnersinthesage.com/blog/obga-meet-the-participating-ranches Winecup Gamble project (Elko District, Wells FO) is in the final stages of finishing their Rangeland Health Evaluation. They anticipate issuing a fully processed permit in FY21.

*Please see the SANE Conservation plan for specific project details available at <http://www.saneconservation.org/documents.html>

5.8 COMMENTS NOT SPECIFIC TO ANY AREA

NDOT Comments:

- **Noxious and invasive weed management:** NDOT recognized the importance of this issue last year and NDOT through the ENV Division now provides funding to the Nevada Department of Agriculture for a NDOT dedicated full-time position to serve as point for NDOT's weed management efforts. This position will provide review of noxious weed management plans submitted by contractors and permittees as well as provide training and specialist assistance to NDOT staff.
- **Fuel Breaks:** generally, highways serve as effective fuel breaks, however any focus to increase the effectiveness of NDOT ROW as fuels breaks must consider Department air quality and stormwater requirements if reducing vegetation is the goal.
- **Wildfire:** NDOT through its District personnel will continue to work closely with wildfire incident teams.
- **Health of grass scrub communities:** NDOT will continue to use native seed mixes as part of its revegetation efforts within NDOT ROW.
- **Wild and estray horse population management:** NDOT supports efforts to manage the populations of wild and estray horses as growing populations have become a safety issue on NDOT roadways.

USFWS Comments:

- The U.S. Fish and Wildlife Service (Service) recommends the Ruby Lakes National Wildlife Refuge be included in the list of interested stakeholders. They have been contacted for a review of this report and their comments are included herein.