BRIAN SANDOVAL Governor

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STATE OF NEVADA Sagebrush Ecosystem Program

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Dear...,

The Sagebrush Ecosystem Council has identified several threats associated with the loss of sagebrush ecosystems in Nevada. Two of the principal agents that pose the most significant threats are wildfires and invasive annual grasses. Nevada's Sagebrush Ecosystem Program is focused on working towards collaborative solutions to effectively address these and other threats. Nevada had over 1.2 million acres burn in 2017. Of that, over 600,000 acres occurred in either priority or general sage-grouse habitats, most of which were on federally managed lands. While most fires are contained before they become large and long duration fires, the cost of the small percentage of fires that are not continue to consume tremendous amounts of resources and firefighting costs. With continued increases to firefighting costs, the issues concerning fires in the Great Basin will continue to become exacerbated.

While significant improvements to organizational structure have been made in how suppression efforts occur on the landscape, the current mechanisms and procedures used to fund these and other efforts have been disruptive to other critical programs and services. We feel that the act of "fire-borrowing" within and amongst similar agencies is not an effective way to fund and address these emergencies. For instance, in the last 15 years, fire suppression costs have exceeded appropriations in all but four years for the United States Forest Service (USFS). That has led the agency to conduct fire transfers (funding) nine times within that timeframe. To our knowledge, the USFS is the only federal agency required to fund its entire emergency management program through its appropriated discretionary budget.

Also of concern is the way in which post-fire rehabilitation is funded. Climatologically, Nevada is the driest state in the nation. Our average precipitation is generally based upon years of drought or exceptional moisture, with a few 'average' precipitation years in between. Some burn sites may require several attempts just to stabilize the soil from erosion, but should be followed up by additional remedial actions to further assist in recovery. A lack of locally collected (natural or cultivated) native seed sources have led to seedings that can be ineffective for the ecological sites recovering from fire. Native and sometimes desirable non-native seed sources can be difficult to find and can be very expensive, leading to the use of less desirable or adapted species or seed sources.

We respectfully offer the following list of recommendations and would certainly welcome others that may address these concerns. (Several of these are addressed in Section 7.1 of the 2014 Nevada Greater Sage-grouse Conservation Plan.)

- Large fires create emergency conditions to landowners, ecosystems, and the species found in those ecosystems and should be funded like any other natural disaster.
- Examine alternatives to the practice of fire-borrowing within federal agencies.

- Active forest and rangeland management (reduction in fuel sources) should continue to be funded not just around urban locations, but also throughout the sagebrush ecosystem and Humboldt-Toiyabe National Forest.
- Dependent upon conditions, allow for greater flexibility in grazing permits that would contribute to the targeted reduction of fine fuels (from 1-3 years) subsequent to above average precipitation years.
- Funding for local seed collection or seed cultivation should occur on an annual basis to offer continual sources in recovery efforts, regardless of the fire loss during any particular fire year.
- Where the potential for recovery to a desirable state exists, provide greater funding flexibility for sites to be recovered and trending towards a desirable vegetative state.
- Funding specific to the proactive preservation of large and intact expanses of sagebrush ecosystem habitats to benefit sage-grouse, other wildlife species, and present uses.
- Sufficient funding to support monitoring of burn areas to address post-treatment outcomes or recommend further remediation if necessary.

In Nevada, approximately 86 percent of the land base is managed by federal agencies for multiple uses. These lands provide exceptional open space, fish and wildlife habitats, and high desert ecosystems unique to the Great Basin. Responsible use, preservation, and active management of these lands are essential to the local and state economies through the industries, recreational activities, tourism, and style of life that they provide. We look forward to the continued collaboration with our federal partners in addressing these and other threats facing the sagebrush ecosystem. We appreciate your time and attention to these matters and would be pleased to offer additional support.

Sincerely,

J.J. Goicoechea Chairman Sagebrush Ecosystem Council

Cc: