Comments by Duane Coombs, Smith Creek Ranch

A possible funding mechanism for GRSG habitat improvements using Conservation Credits or Stewardship Agreements on BLM Lands.

1. Introduction

For interested permitees an allowance will be made to allow a stewardship agreement that would offset the billed AUM fees for habitat work done on the allotments.

2. Background

The lack of funding mechanisms for needed habitat improvements within the scope of GRSG range has been identified numerous times as an issue in favor of listing.

Permitees of public rangelands administered by the BLM many times have the basic equipment to do many habitat improvements, or at the very least have access to equipment administered by the conservation districts.

Like many businesses ranching is a cash flow poor enterprise, yet has certain flexibility in some fixed costs, especially labor.

3. Range of Opportunity

In 2010 there were 1,138,171 active AUM's used on BLM lands in Nevada. Assuming a \$1.87/ AUM grazing fee, \$2,128,397.77 was sent to the US Treasury. If 4100 funds (range improvement fund) accounted for 40% of the total, \$1,277,027.86 would be the balance remitted to the government or ultimately available to put on the ground. This figure is a yearly availability. Proposal will be revenue neutral.

Proposal fits with the original spirit of the Taylor Grazing Act.

Advantages of this proposal include; increased efficiency as dollars are put directly on the ground, increased synergy resulting from using local input and labor, dollars would stay in local economy, arrangement will not affect the ongoing work of local grazing boards, the potential for work to be done under a CX (locally smaller scale).

4. Scope of work possible.

Brush treatments, seeding, removal of conifers from riparian areas, treatment of encroaching conifer, road work or trail improvements to encourage the use of existing roads and trails, headcut revetments, stream work (ie. Weirs, sedge plugging, willow planting, etc.), hardening of stream crossings, noxious weed abatement, installation of fence markers, etc.

5. Example

If my grazing bill for 2013 were \$20,000, 60% or \$12,000 would be available for the credit program. During the course of the year I was able to; cut 43 acres of pinyon @ \$200 = \$8600, replaced a culvert (BLM provided materials) 5 hours equipment time @ \$100 = \$500, and put up 2 miles of fence markers on an existing boundary fence (BLM provided materials) which took 4 hours @ \$40 = \$160. The total value of services I rendered would be \$9260. This dollar amount would be credited towards my yearly grazing bill. Ultimately if contracted, the services provided would cost significantly more than \$9260.