



BLM Nevada State Office
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July 9, 2020
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Targeted and Prescribed Grazing: Preliminary EA Comments

Dear BLM Nevada State Office,

Thanks for inviting the public to review and comment to the preliminary Environmental Assessment (EA) entitled *Targeted and Prescribed Grazing of Annual Grasses in the Great Basin Ecosystems of Nevada* (DOI-BLM-NV-0000-2019-0003-EA). The announcement about the current EA established a 30 day comment period that was initiated on June 10, 2020. We and numerous other grazing permittees and livestock industry organizations previously submitted scoping comments regarding development of an EA for *Targeted Grazing* that initiated this effort.

We appreciate that BLM incorporated many of the grazing permittee and livestock industry organization scoping comments and recommendations into the current preliminary EA. It is imperative that real efforts are made to address and reduce fine fuel loads from invasive annual grasses (primarily cheatgrass) which have intensified wildland fire behavior and diminished ecological integrity throughout much of the Great Basin. We strongly support the effort by BLM to implement Secretarial Orders 3336 and 3372 by better managing invasive annual grasses through a programmatic process to authorize a variety of targeted and prescribed livestock grazing practices to reduce hazardous fuels in the Great Basin ecoregions of Nevada.

We endorse the EA's recognition that the primary goal of such targeted and prescribed livestock grazing treatments is to reduce hazardous fuels and/or create fuel breaks rather than to promote livestock production. For this reason, common themes in the previous permittee/livestock industry scoping comments included:

- Targeted (or prescribed) grazing of annual grasses to create fuel reductions and/or fuel breaks, reduce invasive annual grass densities, alter fire intensity, frequency, duration, and/or size, and improve or restore ecological functions.
- The use of categorical exclusion or Determination of NEPA Adequacy (DNA) processes to promote timely, efficient approval of targeted (or prescribed) grazing treatments for fuel reductions and/or fuel breaks to facilitate project implementation in the same year the opportunity is identified.
- No AUM fee charges for forage harvested under targeted (or prescribed) grazing treatments because they are intended to achieve vegetation objectives.
- All the action alternatives analyzed under the EA be identified as equally valid because all of them may be appropriate in specific situations to achieve specified vegetation objectives.

- Recognize that effective treatments may require increased stock densities with livestock numbers that exceed those allowed under term permits, may require grazing outside the permitted season-of-use specified by existing grazing permits, and may require utilization levels on the target annual grasses that exceed allowable use levels established under other planning documents, so applications for targeted (or prescribed) grazing treatments must not be constrained by terms and conditions associated with existing term grazing permits but must be processed and approved independently of them.
- Applications for targeted (or prescribed) grazing treatments need to allow a large degree of flexibility so site-specific treatments can be custom tailored to the circumstances present in individual treatment areas.
- All kinds and classes of livestock must be available as tools to achieve treatment objectives under targeted (or prescribed) grazing projects.
- Livestock numbers used during such treatments should be established based on vegetation production levels and post-treatment objectives.
- Monitoring requirements for targeted (or prescribed) grazing treatments need to be tailored to provide meaningful management level information rather than research quality statistical data.
- The monitoring protocols and sampling intensity must be sufficient to provide valuable information to guide management decisions, without being too onerous, costly, and/or time consuming to ensure that monitoring requirements do not prevent desirable targeted (or prescribed) grazing projects from being applied for or implemented.

We support the EA's reliance upon science-based concepts that utilize ecological site descriptions and state and transition models to provide information regarding resource conditions and anticipated responses to proposed treatment actions. We further back the work that was done to assemble these information sources into Disturbance Response Groups (DRGs) and more broad Great Groups to simplify project planning efforts for the proposed targeted and prescribed grazing treatments.

We concur with the EA's recognition that the success of targeted or prescribed grazing treatments will often require substantial investments in temporary infrastructure to facilitate the projects, including (but not limited to):

- Temporary fencing (such as traditional wire fences or electric fences).
- Temporary watering facilities (such as water haul sites, temporary pipelines, the creation of temporary water gaps to surface sources that are otherwise inaccessible, or the addition of stock watering infrastructure to wells or other water sources that are currently only used for other purposes).
- Temporary salt/supplement delivery systems.
- Improved road maintenance on existing roads or the creation of temporary access roads may be necessary to facilitate treatment, or facilitate the other required temporary infrastructure discussed above.

We look forward to continuing to work with BLM to get a programmatic, streamlined, and efficient process in place for the timely authorization of targeted and prescribed grazing treatments to reduce fire danger and improve rangeland conditions.