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Humboldt County, Nevada Board of Commissioners



Humboldt County Courthouse
50 West Fifth Street Room 205
Winnemucca, Nevada 89445

January 3, 2023

Bill Dunkelberger
Objection Reviewing Officer
Intermountain Region USFS

Via email to: objections-intermtn-regional-office@usda.gov; CC: boyd.hatch@usda.gov

Subject: Humboldt County, Nevada Comments to the Santa Rosa Range Management Project draft
Decision Notice/Finding of No Significant Impact and Final Environmental Assessment

Dear Mr. Dunkelberger,

Humboldt County, Nevada (County) appreciates this opportunity to review and provide comment to the Santa Rosa Range Management Project (SRRMP) Draft Decision Notice/Finding of No Significant Impact and Final Environmental Assessment (Final EA). The County has participated in public meetings and has submitted written comments associated with the following public involvement opportunities:

- Humboldt-Toiyabe National Forest Notice of Proposed Action: Comment letter submitted May 13, 2020
- Santa Rosa Ranger District Rangeland Management Plan scoping notice comment period: scoping letter submitted May 10, 2019.

These previous comments are hereby incorporated by reference. As stated in the County's 2019 scoping comments this project has the potential to impact the County's customs, culture and economy. In previous letters, the 2012 Update of the Humboldt County Master Plan was cited to provide basis for comments. Since that time, both the Rangeland Management and Health and Livestock Grazing portions of the County Plan were updated in 2019 and 2020 and are incorporated by reference below. The County's Goals for rangelands are broadly summarized below as seen in master plan updates:

Rangeland Management and Health

Goal: In order to protect public welfare and safety, safeguard a stable local economy, and protect ecological health throughout the County, Humboldt County expects federal land management agencies to conduct ongoing, scientifically informed range management activities on federal lands, executed with the maximum cooperation and coordination allowable under federal law with Humboldt County, local weed, fire, and conservation districts, and grazing permittees.

Livestock Grazing

Goal: To ensure that public lands grazing in Humboldt County is a permanent, primary economic driver, an effective range management tool, and a thriving element of County culture through:

- 1) ensuring active livestock AUMs are maintained, at a minimum, at current levels;

2) ensuring all currently designated grazing allotments continue to be available for grazing;
 3) ensuring that forage production is maximized by maintaining or (where appropriate) improving rangeland health trends;
 4) ensuring all management decisions are based on current, scientifically sound, site-specific findings;
 5) developing and implementing ongoing cooperative permittee rangeland monitoring regimes and
 6) achieving a high level of permittee / agency collaboration and trust by ensuring: joint development of allotment management plans; annual permittee/agency operating plans; cooperative adaptive management; transparency in management; ongoing communication; and common goal setting.
 Based on consistency with the above elements of the Humboldt County Master Plan, the County supports the following key elements of the SRRMP Draft Decision Notice and Alternative 1.

- Continual grazing authorizations within all Santa Rosa Ranger District active grazing allotments (see Livestock Grazing Goal no. 2 above).
- Added flexibility granted to permittees in season of use and varying head months with an objective of ecological sites meeting their current site potentials. The County recognizes increased flexibility as an opportunity to increase ecological condition (see Livestock Grazing Goal nos. 3, 4, and 6 above).
- Similar to above, the County supports the flexibility of Forest Service staff and the permittee to modify grazing management systems as needed based on site conditions (see Livestock Grazing Goal nos. 3, 4, and 6 above).
- The standardization of monitoring and management objectives developed in close coordination with permittees (see Livestock Grazing Goal nos. 5 and 6 above). Additionally, clarification explaining that utilization studies to determine utilization conformance will be conducted at end of growing season is appreciated as incorporated from the County's Comment letter submitted May 13, 2020.
- Incorporation of monitoring methodology specified by the Nevada Rangeland Monitoring Handbook (3rd edition, SP-18-03) as requested in the County's Comment letter submitted May 13, 2020.
- The modification, maintenance, and improvement of 11 existing rangeland developments to encourage better livestock distribution across vast landscapes as requested in the County's Comment letter submitted May 10, 2019.

The County supports the SRRMP and proposed decision broadly in its intent to increase flexibility to permittees with the goal of enhancing ecological conditions within a site's current potential. However, the permanent retirement of 868 head months in the Granite Peak Allotment (found in the Draft Decision Notice) is in direct conflict of Livestock Goal no. 1 cited above in the County Master Plan. The importance of maintaining head month numbers at current levels at minimum was made clear in the County's May 13, 2020 comment letter to the proposed action. Head month reduction was not analyzed in the Final EA or made available for comment prior to the objection period. Additionally, the claim made on page 23 of the Final EA stating that head months across the district will not be reduced is no longer true. The County appreciates the willingness of the Forest Service to relocate a permittee out of Granite Peak to the Buttermilk allotment and recognizes that this redistribution does not change the number of active head months on the district. However, this decision does reduce unallocated head months available in the district that could be used at a later date when conditions allow. Rather than permanent retirement, the County would recommend that unallocated head months in Granite Peak remain unallocated to be available for use at a later period when ecological conditions justify, similar to how unallocated head months are managed in the Buttermilk Allotment.

On pages 15 and 16 of the EA, the wildlife design elements call for specific buffers from sensitive wildlife habitat but the locations of these habitats have not been made available to permittees. As stated in the County's May 10, 2019 scoping comment letter, increased flexibility and adaptive management

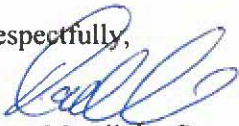
should be based on close coordination with effected permittees. With open communication, these sensitive areas can be managed for prior to a resource concern arising.

The County recommends adding to the draft decision that utilization rates stipulated in Table 5 are intended to be averages of multiple utilization studies within an allotment. Currently, (pg. 9) utilization rates are described as not to exceed a specified percentage which may mislead a reader into understanding that a single utilization measurement over the desired goal could trigger livestock to be moved immediately. Rather, the understood intent of the Santa Rosa Ranger District is that average utilization levels during the grazing season will trigger livestock moves and averaged end of season utilization studies will determine compliance.

On page 13 of the EA it is stated that initial short term monitoring may occur suddenly without notice to the permittee. The County recommends adding clarification that permittees should be contacted prior to monitoring as much as possible to maintain open communication throughout the grazing season.

Based on the above, the County appreciates the Forest Service's initiative to better meet resource goals and objectives by increasing flexibility of grazing management on the Santa Rosa Ranger District. The County intends to remain engaged in this project as it has a direct effect on the County's custom, culture and economy. As such, please feel free to contact me anytime to discuss this comment letter or the project in general.

Respectfully,



Dave Mendiola, County Manager