



Nevada Native Plant Society
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December 3, 2024

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Re: NNPS comments on the EHRM Project

On behalf of the Nevada Native Plant Society, I am pleased to submit comments on the proposed East Humboldt and Ruby Mountains Fuels Reduction and Landscape Resilience Project (ERHM). The Nevada Native Plant Society (NNPS), is a non-profit organization whose mission is to stimulate an interest in and an appreciation of native plants and their conservation.

We appreciate the information provided in this Notice of Proposed Action (NOPA) on the vegetation groups and their existing conditions as well as their desired conditions and the explanations of ecosystem resilience and resistance, part of healthy forest ecosystems which we all support, and the identification and provisions for protecting cultural and historic resources in the project area.

While we support the objective and the goals of the proposed project, we have some questions and some concerns about potential impacts of implementing the project on ecosystem health.

Questions:

1. Could you provide more information on the "fire-dependent" ecosystems (p.4) that occur within the project area?
2. Also, could you provide more information on "condition-based management" (p. 5) and how this management affects the efficiency for landscape-scale projects such as ERHM?
3. Could you explain what is meant by the footnote on "accepted land management practices" (p. 9) and how these practices affect desired conditions in the project area?

4. There is a reference (p. 9) to a report on review of vegetation groups and desired conditions, historical fire and disturbance regimes which "will be provided" in 2024. Could you make this report available on your website and/or add a link to this report on your website?
5. Could you explain what and where the "core sagebrush regions" (p. 14) are in the project area?
6. Could you explain how sage-grouse habitat will be prioritized and protected (p. 14) as a high-value resource in fighting wildfires in the project area?
7. Could you explain how proposed treatments to reduce fuel loads (p. 15) in the sagebrush ecosystem benefit sage-grouse?
8. Could you explain how prescriptive grazing improves ecosystem health (p.15) and how is that measured?
9. Could you explain the relationship between the information in the Desired Conditions section and the information in Table 2? For example, the conditions of Pinyon-Juniper Woodland (p. 10) are stated as 10% highly departed from historic conditions, 4% moderately departed and 86% little departure while Table 2 (p.15) lists Vegetation Condition Class of Pinyon-Juniper woodland as low - 85.5%, moderate - 4.1%, and high - 10.2%? The explanation in Footnote 1 seems to reverse the information on Desired Conditions. Why would the Forest Service focus fuels treatments on Pinyon-Juniper Woodlands if the majority are only 10% highly departed from historic conditions?
10. Could you provide more information on "water drafting" (p.23) in the Other Activities section and its relationship to using herbicides, fungicides and/or biochemical treatments?
11. There is a statement (p.31) on threatened, endangered, and/or candidate species and Forest Service sensitive species being "the emphasis of the analysis," but no information on which issues the statement is referring to. Is the "analysis" mentioned here on the environmental impacts of the proposed action on each of the resources or does it apply to the "in the forthcoming Project-specific biological evaluation," also mentioned in this statement on p.31?
12. Could you provide more information on the protection of critical infrastructure (p.4) in the Need for Action section? Are powerlines considered to be critical infrastructure?

What is the status of hazardous fuels in power line rights of way in the project area?
Where are the power lines located in the project area?

Concerns and recommendations:

1. Proposed treatments to "thin" sagebrush: According to sage-grouse experts, despite three decades of unprecedented conservation efforts, we are still losing sagebrush at a rate of 1.3 million acres per year. See:

<https://www.sciencedirect.com/science/article/pii/S1550742424001337>

In addition, the priority of most sage-grouse conservation plans is to keep intact sagebrush and we have learned through our experiences on the Sheldon NWR in Nevada that it can take 25-35 years before sage-grouse are able to use sagebrush which was restored as part of rehabilitating burned sagebrush areas. We understand that the Nevada Department of Wildlife also opposes the loss of more sagebrush areas. We do not understand why the USFS is proposing to use broadcast burning (p.19) in the project's sagebrush areas.

We recommend that "thinning" sagebrush or removing it manually or with herbicides or prescribed fires not be included in the EHRM project proposed actions.

2. Prescriptive and targeted grazing is also a proposed action, yet grazing is also the cause of departures of forest ecosystems from desired conditions. Please provide more information on how and where this kind of grazing has benefited ecosystem conditions and/or reduced or removed hazardous fuels in Nevada.

3. Please include requirements for breeding bird surveys in conifer and pinyon-juniper ecosystems to avoid adversely affecting breeding by Clark's Nutcrackers and Pinyon Jays before any fuels treatments are implemented.

4. Weeds are a significant hazardous fuel, yet treating or removing weeds is not mentioned in the Need for Action section (p. 4). We recommend prioritizing weed treatments and removal in the Need for Action and in the Proposed Action.

5. We could not find any proposal for monitoring in the NOPA, yet without monitoring there is no way to assess whether fuels treatments meet project objectives and goals or should be changed, if unsuccessful. Please include how the Forest Service will be using monitoring in the EHRM project.

6. Restoration planting and seeding: the Forest Service commitments in the NOPA for the use of native plants and seeds in restoration of vegetation communities should be

actually required and not phrased as "if needed," or "may occur," or be "emphasized."

The EHRM project is a very ambitious proposal which will require significant funding and staff to implement. Yet it is also critical to protect our forests from increasingly frequent catastrophic wildfires. We recommend that the Forest Service focus on addressing the causes and not just the symptoms of increasingly hazardous fuels, including evaluating and updating existing land management practices. Thank you for considering our comments.

Sincerely,

/s/ Rose Strickland

Rose Strickland
NNPS Conservation Committee