

Year End 2015 Argenta Monitoring Report - Response to Public Comments

Comment ID#	Key point(s)	Comment	Response
1	Lack of information: pictures, differences between this report and past years	The information provided on the 2015 report is much reduced from the 2014 annual report for the Argenta allotment and therefore lacks comparable information and makes understanding livestock impacts over recent time difficult. For example the 2015 report lacks multiple photographs of riparian monitoring areas including upstream and downstream and across site photos. Without full photo recording of livestock impacts the public cannot understand whether the BLM is adequately reporting on negative impacts on public resources by livestock.	The size of the electronic copy was limited so that it could be emailed to interested parties and readily downloaded from the BMDO website. Because photographs greatly inflate the size of electronic documents, they were intentionally limited to a representative photo of each site. In place of photographs, the 2015 monitoring report provides monitoring data, which were collected in an unbiased and representative fashion following standard protocols; therefore, the annual-use measurements, and not photographs, provide evidence of annual use as stipulated in the Settlement Agreement. Upon request, the BMDO can provide additional photographs.
2	Lack of information: bank alteration, trampling of riparian areas, water-haul/supplemental feeding sites	The 2015 Argenta monitoring report lacks any information in regard to livestock-caused bank alteration or livestock trampling of designated riparian monitoring sites or anywhere else on the allotment including the upland salting and supplement feeding sites or water-haul sites. The BLM's 2014 end-of-year report repeatedly references trampling damage caused by livestock at the same sites.	Streambank-alteration data are included in the March 14 report (see p. 34) that was distributed to the public, so the nature of the comment is unclear. Although the bank alteration data were displayed, there was not a compelling reason to go into too much detail over them for a couple reasons. First, the Settlement Agreement (see section 6.9.3) sets no annual limit on this measurement; and more importantly heavy rainfalls and high streamflows immediately preceding data collection. High streamflows obscured and obliterated alteration features at several sites, so the data were not entirely reflective of impacts in the 2015 grazing period.
3	Confidence intervals, bias towards permittees, change from what has been done in the past	Previous years' monitoring as reported in the 2013 and 2014 reports for the Argenta allotment did not use confidence intervals in monitoring of upland or riparian DMAs or key areas. As someone who has been involved with BLM monitoring for more than 35 years, I know the use of confidence intervals for statistical inferences on livestock grazing impacts is so rare as to be notable. In this case, the only conclusion that can be made is that the BLM and the NRST are more interested in assisting the permittees in avoiding outcomes that might reduce livestock numbers or use on the allotment and by choosing to use statistical confidence intervals the BLM and the NRST are also choosing to undermine public faith in their monitoring especially considering no such statistical analysis has been used before 2015 on the Argenta allotment. Additionally, ignoring major livestock impacts through hoof action is remarkably and professionally irresponsible.	The use of confidence intervals is required in rangeland monitoring. For example, the Interagency Technical Reference on utilization studies and residual measurements states "5. Confidence Interval In rangeland monitoring, the true population total (or any other true population parameter) can never be determined. <u>The best way to judge how well a sample estimates the true population total is by calculating a confidence interval. The confidence interval is a range of values that is expected to include the true population size</u> (or any other parameter of interest, often an average) a given percentage of the time (Krebs 1989). <u>Confidence intervals are the principal means of analyzing utilization data.</u> For instructions in calculating confidence intervals, see the Technical Reference, Measuring & Monitoring Plant Populations." (Coulloudon et al. 1999, p. 13; emphasis added). For a detailed explanation, see issue resolution documents on interpretation of upland utilization data and interpretation of stubble height data. With respect to hoof action, see response above.
4	Adaptive management requirement, 2016 stockmanship plans	In regard to the adaptive management requirement of the settlement, the BLM and NRST must include in the 2016 stockmanship plans adequate protections for riparian areas to ensure that another year of highly negative livestock impacts will not occur and that all standards are met in 2016. Moving livestock much earlier than was done in 2015 is needed to enable improvement in monitored riparian areas as well as unmonitored riparian areas that are, no doubt, suffering the same high level of degradation by livestock grazing and hoof-impacts. BLM's 2016 stockmanship plans must specify whether AUMs authorized in 2016 are at reduced levels in use areas where standards were exceeded during the 2015 grazing season.	The CMG discussed this point at the March meeting. See CMG March meeting notes pp. 31-32 and 34 for details. In addition, the 2016 stockmanship plans are included in the March 14, 2016 version of the 2015 monitoring report. The CMG agrees that there is a need to ensure that another year of negative impacts does not occur. To illustrate this agreement, note that the March CMG meeting notes (pp. 31-32) and the 2015 monitoring report (p. 4) state "... the CMG will implement more frequent within-season monitoring at the sites that did not meet the prescribed use levels or sites where the 95% confidence interval spans the prescribed use levels in 2015. In addition, as the within-season utilization levels reach predefined levels, the frequency of within-season monitoring will increase so the permittees can move livestock in a timely fashion before prescribed limits might be exceeded."
5	Low moisture block supplements/water haul sites, Resource Management Plan Amendment for Greater Sage-Grouse for Nevada and Northeast California	The 2016 stockmanship plans must also specify that areas where low moisture block supplements or water haul sites are allowed are not located within 1 mile of riparian areas, springs, or meadows. If the stockmanship plans do not include direction for watering and supplement sites to meet those distance requirements from riparian areas, springs and meadows, they will conflict and violate provisions from the Resource Management Plan Amendment for Greater Sage-Grouse for Nevada and Northeast California adopted by the BLM in September 2015.	The GRSG RMPA currently does not apply to the settlement agreement, which was in place prior to the GRSG RMPA. Additionally the implementation of the GRSG RMPA will be through the evaluation process as identified in the GRSG RMPA. A broader analysis of range conditions and grazing management would be considered following the RHE of the Allotment prior to issuing permit renewal decisions. The Nevada State Permit Renewal Team is currently working on this process, which is scheduled to be completed by February 28, 2018.