



# Nevada Farm Bureau Federation

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## Draft Comments

Naval Facilities Engineering Command Southwest  
Code EV 21.SB  
1220 Pacific Highway  
Building 1, 5<sup>th</sup> Floor  
San Diego, CA 92132

Re: Nevada Farm Bureau Comments For Draft Environmental Impact Statement Concerning  
The Fallon Range Training Complex Modernization

Thank you for your consideration of our organization's comments regarding the Navy's  
November 2018 Draft Environmental Impact Statement (EIS).

In the EIS, several observations are made to the view that taking away people's property is not an obligation of the National Environmental Policy Act (NEPA) being considered... "Based on the analysis in the Draft EIS, not mitigation measures are proposed for livestock grazing. Though not a NEPA mitigation measure, the Navy acknowledges that it has the authority under the Taylor Grazing Act of 1934, to make payments to federal grazing permit holders for losses suffered as a result of the withdrawal or other use of former federal grazing lands for war or national defense."

Our comments focus on the appropriation actions to be taken for reimbursement for the loss of private property and the impact of lost livestock grazing Animal Unit Months (AUMs).

Based on the EIS, we call attention to recognition that the plans associated with this modernization could affect as many as 17 Bureau of Land Management (BLM) grazing allotments with the potential loss of 7,920 to 10,992 AUMs.

Many of those impacted by the anticipated closure and withdrawal of federal lands are Farm Bureau members with livestock grazing permits. Our public policy regarding this matter states...

### **"Defense – Impacts of Military Reservations:**

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Expansion of training areas, which close or limit multiple use of federal lands need to be clearly justified with considerations given to public input and transparent reasoning given to alternative options. Plans must also take in account and provide the ability for continuation of necessary emergency services and wildlife management activities."

## **Nevada Farm Bureau's Policy Continued...**

“We propose that farmers and ranchers be properly compensated by the military branches or the federal government for any adverse economic impacts, short and long term, of new and existing military activities, reservations or restricted areas.

In cases where grazing allotment closure is required, compensation to grazing allotment owners should be required and should take into account the value of the feed provided for that allotment (within the seasonal context of how that allotment fits into the ranch's operations); the value of the water rights on the allotment (with the full value of the loss or change in status of the water right); the value of any and all range improvements and the consequences of the economic conditions for the ranching operation by the loss of the component provided by the grazing allotment. Compensated water rights should be retired.

This speaks to the long-term economic viability and sustainability of the entire agricultural operation.”

From our review of the Draft EIS we maintain that the Navy inappropriately determined that they would use the “Production function to valuation” method in evaluating possible reimbursement for the loss of AUMs. The Draft EIS considered this as the most appropriate method of the four considered and placed the value for lost AUMs at \$ 56.83 per AUM.

In light of our organization's policy, developed by Farm Bureau members who understand the economic consequences for having federal lands closed from multiple use and unable to maintain livestock grazing, we believe that the best alternative for determining the value of an AUM is based on the contribution of the federal grazing permit to the market value of the ranch property as a whole.

As described by the Draft EIS – “This approach used a method published by Rimbey et al. (2007) and Torell et al. (2012) that estimated permit values ranging from approximately \$100 to \$350 per AUM based on situations where ranch operations were highly dependent on federal land grazing.”

The allotments impacted by the proposed action of Fallon Range Training Complex Modernization closely align with the conditions of being highly dependent on federal land grazing. The nature and seasonal context of how these allotments fit into the ranches' operations warrant consideration of using the method we are advocating, rather than the system selected by the Navy's Draft EIS.

The system that should be used for calculations of the AUM value, published by Rimbey et al. (2007) and Torell in 2012 provide for the value with a formula that relates to each impacted ranch on an individual basis. Instead of working off a range of potential numbers, the most appropriate system would be to use the formula and work with an appraiser on an individual basis to determine the value for the consequences associated with closure or reduction of the allotment. This process would also assist in correctly identifying additional assets/private property (such as water rights) that warrant compensation.

Nevada Farm Bureau will be working to make certain that the impacted ranchers are appropriately compensated for the impacts the final outcome for this project will cause.

Sincerely,