



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

June 21, 2006

Shane DeForest
Bureau of Land Management
3900 E. Idaho Street
Elko, Nevada 89801

Subject: EPA Comments on the Final Environmental Impact Statement (FEIS) for the Sheep Allotment Complex, Big Springs Allotment, and Owyhee Allotments (CEQ# 60225)

Dear Mr. DeForest:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for this project on January 24, 2006 and rated it as Environmental Concerns, Insufficient Information (EC-2). In particular, we expressed concerns with the impacts to endangered species and vegetation associated with the proposed utilization levels. We suggested that another alternative, such as Alternative 4, be selected as it would reduce the season of use in sensitive areas as well as reduce the Animal Unit Months (AUMs) overall. These measures would reduce impacts to sage grouse breeding, nesting, and brooding activities as well as improve the riparian habitat.

While the Bureau of Land Management (BLM) has continued to select Alternative 2 as the preferred alternative, we are satisfied that the alternative has been modified as a result of comments on the DEIS. BLM proposes to implement reduced utilization levels in all three allotments until short-term ecosystem objectives are met. If these are met in all years (from one to three years) of a grazing cycle, the AUMs could then be issued at levels previously proposed in the Multiple Use Decisions for these allotments. The FEIS states that if following the increase in AUMs, the short-term objectives are again exceeded, use would be reduced (p. 2-5). In addition, no livestock grazing will be permitted within ¼-mile of seeps or springs along riparian areas until riparian projects are constructed or until Proper Functioning Condition (PFC) of the areas are attained (p. 2-6). Monitoring and adaptive management have been incorporated into the proposed project to determine the levels at which the allotments should be grazed and the avoidance needed for riparian areas. Therefore, the timely implementation of monitoring and adaptive management plans will be increasingly important. Monitoring should account for not only the need to meet short-term

objectives but should be analyzed in the context of meeting the long-term objectives for the allotments, in particular future impacts to sensitive species.

We appreciate the opportunity to review this FEIS. Please send two copies of the Record of Decision (ROD) to the address above (Mail Code: CED-2) at the same time it is officially filed with EPA Headquarters. If you have any questions, please call me at (415) 972-3988, or contact Summer Allen, the project manager, at (415) 972-3947 or allen.summer@epa.gov.

Sincerely,

/S/

Duane James, Manager
Environmental Review Office

Main ID# 4739