



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 24, 2006

Bureau of Land Management
Elko Field Office
Attn: Bryan Fuell
3900 E. Idaho Street
Elko, NV 89801

Subject: Draft Environmental Impact Statement (DEIS) for the Sheep Complex, Big Springs, and Owyhee Grazing Allotments Sensitive Bird Species (CEQ# 50507)

Dear Mr. Fuell:

The Environmental Protection Agency (EPA) has reviewed the DEIS referenced above. Our review is 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.

On April 14, 2003, three Multiple Use Decisions by the Bureau of Land Management (BLM) Elko Field Office for the Sheep Allotment Complex, Big Springs and Owyhee allotments were challenged in the U.S. District Court. On August 18, 2004, BLM was directed to complete an EIS to determine the impacts of grazing on sensitive birds in the area. This EIS was prepared in response to that direction and proposes to carry forward the alternative from the Multiple Use Decision. Based on our review, we have rated the document as Environmental Concerns-Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). We recognize the need for multiple uses in the area, but we are concerned that the alternative proposed does not fully address environmental concerns in the area.

While Alternative 2 would reduce the Animal Unit Months (AUMs) by 3,711 from the historic grazing permits, it still allows an increase of 6,463 AUMs above the actual average use recorded between 1987 and 1999, in an area that has shown past degradation. Therefore, we recommend the selection of an alternative with less permitted use in degraded areas, such as Alternative 4. The elimination of spring and summer use in the North Pequop Mountain Pasture as well as deferred rotation in the East Pequop Branch and Independent Valley Pastures associated with Alternative 4 would offer additional protection to key sensitive species and their habitats. Of the alternatives analyzed, this alternative seems to be the environmentally preferable alternative and may help address the concerns regarding grazing impacts to sensitive birds in

these allotments.

We suggest BLM consider other alternative measures or enhancements that offer additional protection to both degraded habitat and sensitive species such as sage grouse. In addition, the FEIS should include more information regarding the proposed mitigation for related impacts to vegetation and cultural resources identified in the document. In particular, the FEIS should include the mitigation measures that are agreed upon with the State Historic Preservation Officer. We also recommend the FEIS include clarification on the responsible party for annual spring inspection of trough areas and exclosures and the reassessment of existing water developments. The FEIS should include a more detailed discussion of the issues involved in the 2003 Multiple Use Decision and how the proposed alternative addresses those previous concerns.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send (2) copies to the address above (mailcode: CED-2). If you have any questions, please contact me at 415-972-3988 or Summer Allen, the lead reviewer for this project. Summer can be reached at 415-972-3847.

Sincerely,

/S/

Duane James, Manager
Environmental Review Office

Main ID # 4739

Enclosures: Summary of Rating Definitions

