

March 5, 2007

Cheryl Probert
District Ranger
Bridgeport Ranger District
Humboldt-Toiyabe National Forest
HC 62 Box 1000
Bridgeport, CA 93517

Subject: Draft Environmental Impact Statement for Great Basin South
Rangeland Management Project (CEQ # 20070008)

Dear Ms. Probert:

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 our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

EPA supports the effort to move rangeland conditions of the Great Basin South grazing allotments towards desired functioning conditions. The need for action is clear given preliminary rangeland assessments that indicate areas are not capable of sustaining long term livestock grazing (Appendix 2) or have crossed below ecosystem functional thresholds. Of note are proposed actions to reduce the maximum allowable vegetation utilization rates, implement rest-rotation systems, provide specific Aspen management thresholds, and close Huntoon Valley and the Squaw Creek allotment.

However, the draft environmental impact statement (DEIS) does not provide enough specificity regarding existing conditions, proposed management actions, and the potential environmental impacts of these actions. Site- and allotment-specific conditions, resource problems, and management measures to fix these problems are not disclosed. We recommend the final EIS (FEIS) provide more specific information so that the public, decision-makers, and permittees fully understand the exact resource problems that need to be addressed, proposed management measures to address these problems, and the impacts of these measures. Furthermore, the DEIS does not provide specific information concerning future planning actions. We recommend the FEIS include a schedule for development of revised allotment management plans and a commitment to tiered environmental documentation for these plans.

The Proposed Action would authorize continued cattle grazing and development of new Allotment Management Plans over time (p. 18). Permitted livestock numbers and season-of-use would be modified as necessary to meet properly functioning condition standards. Given the lack of specificity in the DEIS, we are concerned that further resource declines will occur unless immediate rangeland management changes are made. EPA recommends consideration of

expedited implementation of reduced utilization rates, animal numbers, and modified season-of-use where ecosystem and rangeland functions are known to be impaired.

Because of the above concerns and lack of specific information, we have rated the Proposed Action as Environmental Concerns - Insufficient Information (EC-2). EPA's rating and a summary of our comments will be published in the *Federal Register*. Please see the enclosed Rating Factors for a description of EPA's rating system.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact Laura Fujii, the lead reviewer for this project, at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

/S/ Connell Dunning

Nova Blazej, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions
EPA's Detailed Comments

cc: David Loomis, Project Manager, Carson City

Disclosure of More Specific Information

The draft environmental impact statement (DEIS) provides very general information regarding existing conditions, proposed management actions, and the potential environmental effects of these actions. Site- and allotment-specific conditions, resource problems, and management measures to fix these problems are not fully disclosed.

Recommendations:

Where data is available, we recommend the final EIS (FEIS) provide site- and allotment-specific information so that the public, decision-makers, and permittees understand the exact resource problems that need to be addressed, proposed management measures to address these problems, and the potential impacts of these measures. Examples of useful information specificity are available in the EISs developed for the Martin Basin Rangeland Project, Santa Rosa Ranger District, Humboldt-Toiyabe National Forest; and the Commercial Pack Station and Pack Stock Outfitter/Guide Permit Issuance Project for the Inyo National Forest.

We recommend inclusion of the following more specific information in the FEIS:

Description of Alternatives

- Discuss and describe the link between existing conditions and the proposed management measures such as the reasons for proposed season-of-use for each allotment. For instance, explain why summer grazing is proposed only in the Masonic and Rough Creek allotments and why it would not result in adverse impacts on rangeland conditions.
- Include a table comparing current and Proposed Action livestock management measures. This table should include the number of head and animal-unit-months of forage use (AUM), season-of-use, maximum utilization standards by vegetation type, and the specific functional condition of key resource areas such as meadows, riparian areas, and sensitive species habitat. The FEIS should clearly state management commitments, by allotment; such as seasonal exclusions from sage grouse habitat, exclusion of grazing within 0.25 miles of sensitive plant species populations, and lower allowable-use standards for meadows.
- Describe potential restoration opportunities to improve rangeland conditions, sage grouse and Lahontan cutthroat trout habitat, meadows, and riparian areas. Restoration opportunities could include removal of livestock grazing in critical trout habitat, fencing key stream segments, and remediation of mine drainage if present. If applicable, provide a list of possible future restoration projects.
- Describe the monitoring, mitigation, and management measures and commitments common to all allotment management plans.
- Include a table summarizing proposed management actions for each allotment.

Description of Affected Environment

- Describe, by allotment, the percent and/or location of areas which are not functioning as desired, those below habitat threshold standards, and the probable causes of these rangeland conditions. If data is available, provide specific description of meadows, riparian areas, and sensitive species habitat that is at risk. The FEIS should state whether current livestock management practices are linked to identified poor resource conditions and the actions that will be implemented to address these site-specific conditions.
- Disclose existing and proposed livestock management practices within streambed corridors, seeps, springs, and riparian pastures. For instance, describe existing animal numbers and season-of-use within streambed zones; whether fencing exists to limit direct access to streambeds, seeps, and springs; and frequency of livestock rotations on and off direct streambed use.

Description of Environmental Consequences

- Provide a quantifiable estimate of environmental consequences of current management (No Action) and proposed management (action alternatives). For example, identify the specific proposed reduction in AUM and the probable level of habitat improvement in terms of recovery rate (e.g., 5 years, 10 years, 20 years), reduction in soil erosion and compaction, and change in vegetation composition. Statements such as “limited browsing of aspen communities (pg. 28)” should be defined by more specific percent utilization values.

Description of Future Planning Actions

- Provide a specific schedule for the development of Allotment Management Plans, long-term trend studies, and implementation of specific monitoring commitments. We recommend prioritizing the development of allotment management plans based upon the need to address specific resource problems.
- Provide a commitment to tiered environmental documentation for revised Allotment Management Plans.

Alternatives

The DEIS states that areas that do not function as desired, have crossed below habitat thresholds, or are not capable of sustaining long term livestock grazing, are dispersed throughout the allotments (pg. 36 & Appendix 2). Given the limited site-specific information in the DEIS, we are concerned that further resource declines could occur unless more immediate rangeland management changes are made.

Recommendation:

EPA recommends expedited implementation of reduced utilization rates, animal numbers, and modified season of use where ecosystem and rangeland functions are known to be impaired. For instance, consider the closure meadows that are at or below functional thresholds of ecological function. We note that the proposed

utilization standards (pg. 13 Utilization Standards Table) would allow 10-20% foraging utilization of habitats that are below threshold.