



Oregon Natural Desert Association

September 8, 2008

VIA EMAIL

Prineville District BLM
3050 NE Third Street
Prineville, OR 97754
Or_sage-grouse@blm.gov

Re: Scoping Comments on Prineville Sage Grouse Habitat Project – EA OR-050-08-157

Dear Prineville BLM:

Please accept these comments from the Oregon Natural Desert Association (“ONDA”), in response to your public scoping letter of August 2008 concerning “Maintenance and Improvement of Sage-Grouse habitat through Vegetative Manipulation and Access Management, Environmental Assessment OR-050-08-157.” ONDA supports the project’s basic purpose of maintaining and improving sage grouse habitat within the 1.2 million acre project area. As you continue to develop this project and study its environmental impacts, please consider the following issues:

- **Impact of current livestock grazing on habitat:** Please study the impacts of current grazing on sage grouse habitat, including the role of domestic livestock grazing in creating or maintaining the unnatural and undesirable spread of western juniper and invasive weeds and/or the suppression of native grass, forb, and shrub species. The number one land use impacting BLM’s ability to recover these lands permanently, so that inevitable invasive plant species and juniper expansion are not simply temporarily delayed, is livestock grazing.
- **Ensure that restoration is coupled with prevention:** Please ensure that any treatment strategy properly couples restoration and prevention. Restoration without prevention is a flawed strategy. If management after restoration is not altered, the original problems will return. The address this issue head-on, particularly with respect to grazing. These lands cannot be fully restored or recovered without changes in grazing management, including significant rest following treatment and, in some places, complete removal. Cutting down or otherwise treating juniper, coupled with other treatments such as seeding, fencing, planting and so forth, most likely will not improve key habitat areas without bringing livestock grazing under control. Accordingly, please study alternatives that include reductions and/or exclusions of livestock. All alternatives should include pre- and post-treatment monitoring that evaluates the presence and absence of livestock on treated areas in terms of site recovery and maintenance of desired ecological conditions.

- How will BLM deal with improving nesting and rearing habitat vis-à-vis reductions in grazing?** At a minimum, please consider adjusting the grazing matrix to allow for closure of grazing allotments throughout the entire area targeted for restoration. (In advocating for this, of course, we still believe BLM must also address the basic need for immediately reducing or eliminating grazing on lands that need immediate attention.) Please also provide summaries and other information concerning whether lands proposed for treatment are meeting the Fundamentals of Rangeland Health regulations, 43 C.F.R. Part 4180. This is important because large-scale treatment disturbance on degraded lands or lands in poor or fair condition may cause new and accelerated soil erosion, weed invasion, loss of herbaceous understories, water quality problems and other harm other important values of the public lands.
- Prepare an EIS:** NEPA requires agencies to prepare an environmental impact statement where there are substantial questions about whether a project *may* cause significant degradation of the human environment. This is a major, landscape-scale project impacting more than a million acres of land, which likely will take a decade or more to implement, and which potentially involves numerous types of treatments. Under these circumstances, there are substantial questions as to whether the project may have significant impacts, particularly with respect to wilderness values, watersheds, soils, vegetation, and wildlife habitat.
- Study impacts to wilderness values:** Please study the impacts of the proposed treatments and related management actions on wilderness values present within the project area, including roadlessness and other key characteristics of wilderness. Your study should include analysis of the wilderness values, and proposed WSAs or WSA Additions, identified in ONDA's citizen-generated wilderness inventory report. Please include your data, analyses, maps and conclusions in the EIS itself so that ONDA and other members of the public may review and comment upon that information in context, during the NEPA process. ONDA fully supports closure of "user created roads" as is mentioned in the scoping notice; we would particularly welcome closing any redundant or resource-damaging roads within areas identified as having wilderness character, including roadless areas within the project area. Please study in particular those portions of our wilderness inventory report that document route conditions within and adjacent to roadless areas within the project area.
- Juniper control within and outside of lands possessing wilderness values:** ONDA supports juniper control in areas with wilderness characteristics, so long as the treatment methods to be employed in those areas do not negatively impact the wilderness characteristics present. Juniper control in these areas should be subject to appropriate ecological criteria and treatment protocols to be developed during this NEPA process. ONDA is opposed to mechanical treatment on lands possessing wilderness characteristics unless wilderness values are being restored (e.g., aspen stands or riparian areas). ONDA supports mechanical treatment in all other areas *only* if livestock grazing is precluded following treatment to allow for full development and maturation of new plant vigor. Again, because of the key role livestock play in the spread of weeds in areas where

juniper has been removed such areas should be rested from all livestock grazing until they have fully recovered to native species plant communities. Some research suggests this may take as long as a decade or more and that the frequent agency standard of two years' rest is inadequate. See, e.g., U.S. Forest Serv., *Restoring Western Ranges and Wildlands*, RMRS-GTR-136, Vol. I at 194–198 (Sept. 2004) (also noting that the typically-adopted two years' rest following treatment “has never been tested experimentally”). ONDA recommends five years of rest following treatment.

- **Cumulative impact:** Please properly study the cumulative impact of this project. Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes those actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Any data or analyses BLM relies upon to support its final decision must be in the EIS itself. Reference to information contained in databases in an agency office is inadequate unless that data is, at a minimum, comprehensively summarized and presented in the NEPA document.
- **Document the success of past actions to demonstrate the expected level of future success:** The scoping notice indicates that the District has been implementing habitat improvement projects to improve sage grouse habitat annually for time, and that BLM has undertaken separate NEPA analysis for each of these projects. In order to demonstrate the potential for success of the treatments and treatment types proposed under this project, please describe in detail those past projects and their success rates, including post-project monitoring in these past projects. Related to the previous comment, this also is important in terms of evaluating the cumulative impact of the proposed action.
- **Millican lek:** Please indicate what remedial action BLM intends to take to save the lek on the western edge of the Millican desert. In recent memory, that lek has gone from as many as 30 males down to nearly zero currently. BLM must take drastic action in places like this on the fringe of the sage grouse's habitat area in order to preserve the core.

If you have any questions regarding these comments, please feel free to contact me at the address below, or Brent Fenty at 541-330-2638. Please send separate copies of all NEPA and other documentation related to this project, including your evaluation of ONDA's wilderness inventory information, to:

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Thank you for the opportunity to provide public comment on this proposal.

Sincerely,

s/ Peter M. Lacy

Peter M. Lacy (“Mac”)
Oregon Natural Desert Association
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Cc: Brent Fenty, Executive Director
Oregon Natural Desert Association