



Oregon Natural Desert Association

August 30, 2006

VIA EMAIL

Paul Steblein, Project Leader
Sheldon National Wildlife Refuge
PO Box 111
Lakeview, OR 97630

Re: Feral Horses and Burro Management Program—scoping comments

Dear Mr. Steblein,

Please accept these comments submitted on behalf of the Oregon Natural Desert Association (“ONDA”). ONDA is a non-profit, public interest organization based in Bend, Oregon with offices also in Portland, Oregon, whose mission is to protect, defend, and restore forever the health of Oregon’s native deserts. The members and staff of ONDA use and enjoy the public lands of Oregon and northern Nevada, including the Sheldon Refuge, for wildlife watching as well as recreational, scientific, spiritual, educational, aesthetic, and other purposes.

As a group focused on protection and restoration of the native desert, ONDA is concerned about the effects that non-native horses and burros can have on water quality and native vegetation. ONDA also is concerned with activities on, or uses of, the public lands that affect wilderness values. Please address the following issues in the EA.

Fish, Wildlife, and Native Plants

Please analyze the direct and cumulative effects that horses and burros have on fish and wildlife, including sage grouse, Lahontan cutthroat trout, pygmy rabbits, and pronghorn. Please also analyze the direct and cumulative effects that horses and burros have on native plants.

Water Quality

Please discuss the direct and cumulative effects that horses and burros have on water quality. Obviously, excellent water quality should be one of major planning goals of the Refuge, for public health, endangered species, biodiversity, and other reasons. Are any streams in the Refuge listed as water quality limited? If so, for what pollutant?

The evidence linking grazing to riparian degradation and water quality problems is substantial. Grazing degrades water quality by causing bacterial contamination, decreasing oxygen levels, stimulating algal blooms, and causing increased water temperatures as a result of trampled stream banks and denuded riparian vegetation. See Belsky, A.J., A. Matzke, and S. Uselman, Survey of livestock influences on stream and riparian ecosystems in the western United States. J. Soil and Water Cons. 54:419-431 (1999), available at www.onda.org/library/papers/index.html.

Soil, Biological Crusts, and Noxious Weeds

Please discuss the direct and cumulative effects that horses and burros have on soil quality and biological soil crusts. Please discuss the current status of soils and crusts, give the causes of their degradation, and discuss concomitant losses of ecosystem function. Healthy soils are integral for providing nutrients and water to the land and vegetation. Just as importantly, biological soil crusts are a major indicator of healthy rangelands. These crusts stabilize the soil, fix nitrogen, increase soil fertility, increase the growth of higher plants, increase water filtration into the soils, and have a “major influence on terrestrial ecosystems.” U.S. Dept. of the Interior, “Biological Soil Crusts: Ecology and Management,” Tech. Ref. 1730-2 (2001) (available at www.id.blm.gov/publications/data/Crust%20Manual.pdf). Additionally, crusts are critical in preventing the spread of invasive and noxious weeds. See Thomas J. Stohlgren et al., Patterns of Plant Invasions: A Case Example in Native Species Hotspots and Rare Habitats, 3 Biol. Invasions 37–50 (2001) (finding exotic species richness strongly negatively correlated with crust cover, and that crusts often present a “physical barrier to invasive species establishment and growth”).

Please discuss the direct and cumulative effects that horses and burros have on the spread of noxious weeds. ONDA encourages the Refuge to look closely not just at potential treatment for invasive weeds, but the root causes for the spread of invasives. Grazing is one of the most common ways invasive weed seeds are spread on public lands around the West. See A. Joy Belsky & Jonathan L. Gelbard, Livestock Grazing and Weed Invasions in the Arid West, ONDA Scientific Report (2000), available at www.onda.org/library/papers/index.html.

Conclusion

Thank you for the opportunity to participate in this process. When completed, please send copies of the EA to **both ONDA’s Portland and Bend addresses**, listed below. If you have any questions regarding these comments, please feel free to contact us at the addresses below.

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Sincerely,

s/ Kristin Ruether

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