



Oregon Natural Desert Association

February 8, 2007

VIA EMAIL

Lisa Grant
Bureau of Land Management
Burns District Office
28910 Highway 20 West
Hines, OR 97738
Lisa_Grant@blm.gov

Re: Scoping Comments on Smyth-Kiger AMP EA

Dear Ms. Grant:

The Oregon Natural Desert Association (“ONDA”) received BLM’s letter dated February 3, 2007 requesting scoping comments for a proposed EA concerning grazing management on the Smyth-Kiger Allotment (#5331). ONDA looks forward to providing more detailed comments when we have a chance to review the EA, but offers the following comments at this time.

ONDA is a non-profit public interest organization whose mission is to protect, defend, and restore forever, the health of Oregon’s native deserts. ONDA has a long history of interest and involvement in BLM activities with respect to wilderness, grazing, riparian areas, water quality, and fish and wildlife. The members and staff of ONDA use and enjoy the public lands and natural resources in the vicinity of Steens Mountain, including within and adjacent to the planning area at issue, for recreational, scientific, spiritual, educational, aesthetic, and other purposes. ONDA and its members also participate in information gathering and dissemination, education and public outreach, agency land use planning, and other activities relating to the BLM’s management and administration of the public lands of eastern Oregon.

As you prepare the EA for this project, please consider the following issues:

- Please insure the EA discusses impacts to wilderness resource values on these public lands. In a report submitted to BLM in September 2002, ONDA identified wilderness characteristics worthy of preservation in the Riddle Creek Proposed WSA. A portion of that Proposed WSA inventory area lies within the Smyth-Kiger Allotment. Please note that ONDA modified its proposal for the Riddle Creek Proposed WSA by letter dated Mar. 15, 2006, in association with comments on BLM’s Riddle Mountain Allotment & Burnt Flat Allotment permit renewal EA/FONSI (OR-06-025-037 & OR-06-025-033).
- The scoping notice indicates BLM determined in 2004 that several Federal Rangeland Health (“FRH”) regulations Standards & Guidelines were not being met, with current

grazing practices the cause of the failures. As you know the FRH regulations require BLM to make changes to grazing under these circumstances prior to the start of the next grazing season. Please indicate in detail what changes BLM made to grazing management prior to the 2005 grazing season, as well as any other changes that were made since that time. Please also include the data showing that Standards & Guidelines were not met, as well as any additional data collected since that time. In providing this information, please provide detailed information on which pastures have been used, when, and by how many livestock (including AUMs authorized and actually used) since 2004.

- If BLM does not intend to include it (them) as part of the EA, please provide ONDA with a copy of your Standards & Guidelines assessments, evaluations, and determinations for this allotment. Please also provide ONDA with a copy of the current grazing permit.
- Please describe the condition of Shepherd Creek, which lies within the Riddle Creek Proposed WSA, but is not specifically mentioned in the scoping notice.
- The scoping letter suggests BLM will only analyze the proposed action and a no action alternative. Please analyze additional alternatives that would also meet the purpose and need of the project. Because the purpose of the project stems from failures to meet Standards & Guidelines, alternatives involving fewer AUMs and/or fewer areas or pastures grazed by livestock are reasonable and should be considered.
- Along these lines, please also insure at least one of these alternatives considers how the goal of achieving healthy riparian and upland conditions can be achieved without resorting to building additional rangeland structures on the landscape. In ONDA's view, the most deleterious impacts would arise from the types of structural developments described in the scoping letter, particularly spring developments, wells, and cattle guards. These types of developments can impact wildlife and fish habitat, scenic and recreational values, wilderness values, and other resource values on these public lands.
- Since the allotment straddles the Three Rivers and Andrews Resource Areas, please explain which land use plan is governing for the allotment.
- Please provide a map that shows the locations of Greater sage-grouse, redband trout, and Malheur mottled sculpin habitat (including lek sites for sage grouse), in addition to habitat for any other significant or special status species that may be present on the allotment.
- Please insure the EA analyzes how each alternative considered complies with the Steens Act purpose for the Cooperative Management and Protection Area: "to conserve, protect, and manage the long-term ecological integrity of Steens Mountain for future and present generations." 16 U.S.C. § 460nnn-12(a). How is this requirement distinct from FLPMA's underlying duties related to multiple-use and prevention of "unnecessary or undue degradation" on the public lands? See 43 U.S.C. §§ 1732(a), 1732(b).

Thank you for the opportunity to participate in the planning effort for this proposal. Please retain my name on your mailing list for all documents related to this proposal. Please also mail or email me the information requested above in order to further inform ONDA's and the public's review of these projects. If you have any questions regarding these comments, please feel free to contact me at the address below, or ONDA's executive director, Bill Marlett, at 541-330-2638 or bmarlett@onda.org.

Sincerely,

s/ Peter M. Lacy

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Cc: Bill Marlett, Executive Director
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