

Appendix A

Comments and Responses for the Change to Season-of-Use in the Starr Winter Pasture Environmental Assessment (EA) OR-026-01-021

Sierra Club Comment #1: "In the Notice of Final Decision for the Pueblo-Lone Mountain Allotment Management Plan (AMP) dated December 15, 1995, the justification for the Starr Winter Fence (Item 4) states, 'The Starr Winter Pasture is near the valley floor and contains both shrub and grass species better suited for winter grazing than spring/early summer grazing.' This EA needs to clarify that the grasses are still dormant during this new season of use (February and March) and thus will still be categorized as winter use; or else provide new information explaining why these shrubs and grass species are now best suited for spring grazing."

Sierra Club Comment #2: "The EA does not explain why this action would decrease cheatgrass."

Sierra Club Comments #1 and #2 have been addressed under the Environmental Consequences, on Page 2 of the EA, as follows: "The proposed change to the season-of-use would allow livestock to utilize the early season green-up on cheatgrass, while providing for primarily dormant season use of native perennial grasses. This early season use of cheatgrass would aid in decreasing later competition between cheatgrass and more desirable perennial grass species. As an annual plant, cheatgrass seedlings would be weakened by livestock grazing during their initial growth period. The perennial native grasses, utilized primarily during their dormant stage, would still be allowed a full season of growth and seed production after livestock were removed at the end of March, thus providing the same positive plant responses as earlier season winter livestock use."

Sierra Club Comment #3: "Since the BLM intends to keep the AUMs the same even though the season of use would be half as long, the number of cow/calf pairs would double. BLM has presented no information to show that the native grasses can withstand this kind of increased pressure."

Sierra Club Comment #3 has been addressed under the Proposed Action, on Page 1 of the EA, as follows: "A greater number of livestock utilizing the pasture for a shorter season-of-use will result in no change of livestock impacts to the resources in the pasture, since this will result in the same net number of animal-days in the pasture as occurs under the current season-of-use. This will result in no increased pressure to the native grasses, based on the facts stated above that, 'The perennial native grasses, utilized primarily during their dormant stage, would still be allowed a full season of growth and seed production after livestock were removed at the end of March, thus providing for the same positive plant responses as earlier season winter livestock use.'"

Sierra Club Comment #4: "During the development of the Pueblo-Lone Mountain AMP, all the parties

knew full well what to expect when assigning pastures to winter use. Further, it was understood that permittees would move cattle as needed to provide uniform utilization in any pasture during any period of use. The fact that the cows don't go there on their own is not a valid reason to make a change to the season-of-use."

Sierra Club Comment #4 has been addressed under the Proposed Action, on Page 2 of the EA, as follows: "The current season-of-use also limits livestock utilization of the upper elevation portions of the pasture. Snow cover at the upper elevation of the pasture is typically heavier than on the valley floor, and makes this forage unavailable for livestock use. Livestock use is concentrated on the lower elevation forage by necessity, and the resultant uneven utilization pattern cannot be remedied through herding or salting practices. The milder temperatures associated with 2 months of use during February and March will result in reduced snowpack and more availability of dormant forage. This will allow livestock to better utilize the upper elevation portions of the pasture, thereby producing a more desirable pattern of forage utilization. The utilization pattern could then be further improved through herding and salting practices."

Sierra Club Comment #5: "We also find it curious that the letter accompanying this EA states that, '<After consideration of comments received, the Finding of No Significant Impact (FONSI) and a Proposed Decision outlining the action to be taken within the scope of the EA will be developed and issued.' In fact the FONSI and Proposed Decision Record are currently available for download from the Burns web site."

Sierra Club Comment #5 was not addressed in the EA. The FONSI and Proposed Decision Record, as posted on the Burns web site at the time of receipt of this comment, were drafts and unsigned, and did not represent a final finding or decision. The document was posted to the web site in error, was removed from the web site at the time of receipt of this comment, and has been reviewed for accordance with comments received on the EA.

Please respond to <jerry@metfab-heating.com>

To: "Burns District Office" <or020mb@or.blm.gov>

cc:

Subject: EA OR-026-01-021

February 16, 2001

Miles Brown
Andrews Resource Area Field Manager
Burns BLM District Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

Dear Mr. Brown:

The High Desert Committee of the Oregon Chapter of the Sierra Club appreciates this opportunity to comment on the Change to Season-of-Use in the Starr Winter Pasture Environmental Assessment [EA OR-026-01-021]. Our members consider the Pueblo Mountains one of the most special places in Oregon's High Desert and are very concerned about any changes made to the Pueblo-Lone Mountain Allotment Management Plan that was adopted after much cooperative effort in 1995.

In the Notice of Final Decision for the Pueblo-Lone Mountain Allotment Management Plan dated December 15, 1995, the justification for the Starr Winter Fence [item 4.] states, "The Starr Winter Pasture is near the valley floor and contains both shrub and grass species better suited for winter grazing than spring/early summer grazing." This EA needs to clarify that the grasses are still dormant during this new season of use [February and March] and thus still categorized as winter use; or else provide new information explaining why these shrubs and grass species are now best suited for spring grazing.

The EA does not explain why this action would decrease cheat grass.

Since BLM intends to keep the AUMs the same even though the season of use would be half as long, the number of cow/calf pairs would double. BLM has presented no information to show that the native grasses can withstand this kind of increased pressure.

During the development of the Pueblo-Lone Mountain Allotment Management Plan, all the parties knew full well what to expect when assigning pastures to winter use. Further, it was understood that permittees would move cattle as needed to provide uniform utilization in any pasture during any period of use. The fact that the cows don't go there on their own is not a valid reason to make a change in the

season of use.

The lack of explanation and supporting data to justify the action proposed in this EA is bothersome and implies that BLM is taking this change too lightly. BLM needs to provide much more information before the High Desert Committee can support this action.

We also find it curious that the letter accompanying this EA states that, "After consideration of comments received, the Finding of No Significant Impact [FONSI] and a Proposed Decision outlining the action to be taken within the scope of the EA will be developed and issued." In fact the FONSI and Proposed Decision Record are currently available for download from the Burns web site.

Sincerely,

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