

Winnemucca District Drought Response Plan Drought EA
DOI-BLM-NV-W000-2013-0001-EA
Response to Public Comments

No.	Commenter	Comment	BLM Response
1	Individual	To the extent, the Final Drought Response Plan closes allotments or curtails a large number of AUMs, it will be highly controversial, economically devastating for local communities, and would require a full Environmental Impact Statement prior to commencing such actions.	Social and Economic Values Analysis have been performed. The significance of the impacts to socioeconomic values does not rise to a level requiring an EIS (See section 3.3 R of the EA for further explanation).
2	Individual	Before further reducing any AUMs a fuel loading analysis should be made to assess the risk of wildfire. AUM suspensions have allowed fuel buildup which in turn, has led to massive wildfires.	Additional monitoring data (production, utilization, density/cover, bare ground) would be considered as available and appropriate.
3	Nevada Department of Wildlife	Page 14 of the EA states that, “temporary changes to sheep would not be authorized in areas of occupied big horn sheep habitat or areas within nine airline miles of occupied big horn sheep habitat”. We recommend rewording it to state, “Temporary changes to sheep would not be authorized in areas where effective separation cannot be maintained”.	Comment noted. Language regarding domestic sheep separation from bighorn sheep will follow the WAFWA 2012 guidelines as suggested by NDOW. (WAFWA 2012) Domestic Sheep and Goat Management in Wild Sheep Habitat
4	Nevada Department of Wildlife	We recommend including additional measurements (e.g. bare ground, reduced plant density and/or cover) as drought response triggers (DRT) to ensure thorough evaluation occurs and to facilitate your management decision making in regards to recognizing degrading conditions.	Additional monitoring data (production, utilization, density/cover, bare ground) would be considered as available and appropriate
5	Nevada Department of Wildlife	We have concerns with moving wild horses from a degraded area to an intact area (within and HMA) as this could result in greater direct and indirect impacts on wildlife.	The movement of wild horses from an emergency area to an area experiencing minimal impacts would only be considered if resource degradation is not anticipated. Monitoring objectives and studies related to livestock management also apply to management of wild horses and burros (see page 9 of the EA)
6	Individual	Mining, oil and gas, solar and geothermal are “authorized uses” on public land. If BLM is concerned about water and range conditions during a drought, you should curtail/stop these uses as well, to alleviate their impacts on natural resources.	Implementation of this suggestion would not meet BLM’s purpose and need for the action. It is outside the scope of the EA. Mineral authorized use is independent of

			drought. See the additional affected resources section (page 23) of the EA.
7	Western Watersheds Project	40% utilization on upland vegetation is not adequate to provide for sage grouse nesting cover during any period.	Comment noted. Refer to page 9 of the EA for a discussion on Drought Response Triggers. Specifically, those relating to utilization. Utilization triggers would require the activation of DRAs. The utilization triggers range from 25% to 30% depending on vegetation community.
8	Western Watersheds Project	We are strongly opposed to new, temporary or any other fencing; and also opposed to temporary water hauling because these management tools concentrate livestock and intensify resource degradation at a local level. An EIS is necessary for implementing these proposed projects.	Temporary fences as well as other DRAs would be selected using site-specific information. The placement of temporary fences and other DRAs would only be authorized when necessary and appropriate. If fences are used, livestock utilization would be monitored and livestock would be required to be removed once forage is grazed to the stubble heights described in the Drought Response Triggers as discussed and analyzed in the EA.
9	Western Watersheds Project	BLM must fully assess how all of its fuel breaks and fire rehabs are leading to increased site desertification and reduced ability of the land to buffer drought effects.	This comment is outside the scope of the EA. Fire rehab and fuel breaks are analyzed under site specific NEPA that analyze impacts to vegetation, soils, wildlife, etc.
10	Western Watersheds Project	What are the actual use levels across all the allotments on the district? This information is absent from the EA. It must be included to provide a baseline of information for understanding stocking in any areas during drought.	This question is outside the scope of the EA.
11	Western Watersheds Project	BLM fails to examine the current status of habitats and populations, overlay them with areas of known livestock degradation, and determine how imposing grazing during drought will adversely affect sensitive species.	Refer to page 84 of the EA (affected environment/environmental consequences) which does list and discuss sensitive species within the Winnemucca District.
12	Intermountain Range Consultants	The Proposed Action proposes to continue implementation of DRA's for one full growing season after the Drought Monitor says the area is no longer in a drought situation. The Drought Monitor does not claim to be a fine resolution model applicable to relatively small grazing allotments. Therefore, how can the	The drought monitor will be used as a tool to direct where to implement on the ground monitoring (section 2.0A)

		Drought Monitor be used to implement DRA's?	
13	Intermountain Range Consultants	The PEA did not assess, but should have, an alternative to remove all wild horses. This alternative, particularly since BLM has failed or refused to manage wild horses within AML's, would be more rational and reasonable than an alternative to close allotments to livestock grazing when permittees have been in compliance with their term grazing permits.	An assessment is made regarding removal of horses within an HMA on page 103 of EA.
14	Intermountain Range Consultants	The proposed action, relative to water availability trigger, discusses maintaining the "health of upland areas surrounding developed water sources". It is unclear what is meant by this nebulous phrase, but to the extent it means the area within close proximity to these livestock water developments, it is not rational to apply rangeland health standards to areas that are known to concentrate livestock, wild horses/burros and wildlife above that typical of the allotment.	Interagency Technical Reference manuals such as Sampling Vegetation Attributes (1999) and Utilization Studies and Residual Measurements (1999) outline proper selection of monitoring sites to avoid collection of inaccurate monitoring data.
15	Intermountain Range Consultants	The Proposed Action proposes that "Portions of an allotment that lack vegetation and/or water are in poor condition, or are identified as areas to provide vegetation and/or water for fisheries, wildlife and/or wild horses and burros and could be closed to livestock grazing" (43CFR 4710.5). However, the reference to 43CFR 4710.5 applies only to wild horses, and not for vegetation/water for wildlife or fisheries.	Comment noted. Proper citation of the Code of Federal Regulations has been updated in the proposed action of the EA.
16	Nevada Cattlemen's Association	"The Bureau of Land Management is preparing an Environmental Assessment (EA) to analyze a range of drought response alternatives that would be used to mitigate the effects of drought and to address emergency situation." The Association considers this proposed action not to be in compliance with NEPA requirements. The CEQ regulations require NEPA documents to be "concise, clear and to the point" (40 CFR 1500.2 (b), 1502.4).	Comment noted.
17	Nevada Cattlemen's Association	Furthermore, the Association questions BLM's purpose and need to have an Environmental Assessment (EA) to provide management strategies to assist in management during drought. Is flexible management during drought not addressed in Land Use Plans (I.E. District Resource Management Plan), standards for rangeland health and guidelines for livestock grazing, or grazing term permit renewals?	Existing LUP's and management structures do allow for flexibility. The premise behind this action is to make flexible management timely.