



January 4, 2006

Mr. Brian Amme, EIS Project Manager
BUREAU OF LAND MANAGEMENT
Nevada State Office
1340 Financial Blvd.
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

1 Resource Concepts, Inc. (RCI) is submitting the enclosed comments regarding the DRAFT Vegetation Treatments Programmatic Environmental Report on behalf of the N4 State Grazing Board. It is our hope that the BLM Environmental Report preparation team will consider these comments when revising the Vegetation Treatment Report for final publication.

2 The N-4 State Grazing Board has interest in the Vegetation Treatment Report and the subsequent implications of the Record of Decision on public land livestock grazing programs and procedures as well as the Bureau's ability to conduct vegetation treatments as efficiently, effectively, and appropriately as possible. The following is a list of comments regarding the Vegetation Treatment Report. Page numbers are included with each comment for ease of reference to specific points in the document. In general, Resource Concepts, Inc. supports the preferred alternative and we commend the BLM on completing a programmatic document that will allow the use of various vegetation treatments throughout the Western United States.

3 1. Pg. 2-10 The mechanical treatment section failed to mention the use of the Hydro-ax or other chopper/shredders that are part of the mowing tool suite.

4 2. Pg 2-23 In Table 2-4 Vegetation Treatment Methods Standard Operating Procedures and Guidelines, soil resources section, one of the Mechanical and Manual SOPs is to leave plant debris on site to serve as mulch. This SOP is not always appropriate, especially when treatments are occurring for fuels management purposes. By leaving plant debris on site, treatments could actually increase the fuel hazard. This SOP should rarely if ever be used within Wildland-Urban Interface (WUI) areas. Secondly, this SOP does not allow for successful programs such as Fuels for Schools and other rural economic development or stewardship contracting activities to occur. Some plant materials (biomass) could be utilized as a valuable renewable energy source. Additionally, leaving mulch materials on-site could change species composition to favor grasses and shrubs, while reducing occurrence of both annual and perennial forbs (Resource Concepts, Inc. 2004; Benson, Glimp, and Perryman, 2005). Both annual and perennial forbs are

important forage for sage grouse. Also, leaving downed or even chipped pinyon material could attract pinyon ips beetles if chipped between April and October (Bureau of Land Management 2004).

5 3. Pg 2-23 In Table 2-4 Vegetation Treatment Methods Standard Operating Procedures and Guidelines, water resources section, one of the Mechanical SOPs is to maintain a minimum 25 foot buffer near streams and wetlands. There may be many cases where leaving a 25-foot buffer does not meet the objectives of fuel reduction projects, for example in instances where a community evacuation route is also adjacent to a stream. A qualified specialist should determine an appropriate buffer width based upon site-specific conditions, instead of making 25 feet the standard width for an SOP.

6 In the Fire Use SOPs in the same section, light application of fire in riparian areas is not always possible if a buffer must be maintained between treated areas and streams and wetlands, especially since many riparian areas in the West are less than 25 feet in width.

7 4. Pg. 2-25 In Table 2-4 Vegetation Treatment Methods Standard Operating Procedures and Guidelines, vegetation section for Mechanical treatments, there is a SOP to use plant and seed stock from appropriate elevations when conducting revegetation activities. This SOP should also apply to Fire Use and Chemical Control when seeding is necessary.

8 5. Pg. 2-26 In Table 2-4 Vegetation Treatment Methods Standard Operating Procedures and Guidelines, wildlife resources section for Mechanical treatments, limiting chaining clearings to 100 yards in width may not be appropriate for fuels reduction projects. For example, in the Mt. Wilson area (Ely BLM District, Nevada) 600 to 700 feet was the prescription width for tree thinning activities along the wildland-urban interface. A qualified specialist, or specialists, should determine the appropriate chaining width, considering the best available knowledge regarding potential fire behavior and the wildlife habitat concerns of each specific treatment site.

9 6. Pg. 2-27 Table 2-4, wild horse and burro section for chemical treatments, includes an SOP of minimizing herbicide use in areas grazed by horses and burros. This SOP would preclude use of herbicides in millions of acres of Nevada, and substantial acreages in Wyoming. Instead, areas of weed infestations treated with chemical may need to be temporarily fenced. Limiting herbicide use across all herd management areas and other horse and burro grazing areas could lead to increases in noxious weed infestations throughout these two states. In many instances, areas grazed by horses will very likely be a high priority for treatment due to year around grazing, and in some cases overgrazing, which establishes ideal conditions for weed infestations.

10 7. Pg 2-28 Typos in Table 2-4, cultural resources, in the SOP on consulting with tribes for the mechanical and manual treatments.

- 11 8. Pg. 2-29 In Table 2-4, visual resources, the SOP's for mechanical treatments include revegetating treated sites. Hopefully many mechanical treatments occur in areas where adequate perennial grass densities and seed sources exist to preclude the need to seed these sites after treatment. This SOP should always be based on site-specific conditions, and determinations of need for revegetation should be made regardless of vegetation treatment used (fire use, mechanical, manual, and chemical treatments).
- 12 9. Pg. 4-8 In Ch. 4 Effects of Vegetation Treatments, Soil Resources SOP's, the second SOP calls for leaving plant debris on site when appropriate. This SOP requires knowledge of the effects of leaving plant debris on plant succession and species composition before application. Research and small demonstration projects should be conducted first before this SOP is applied. (See comment #2 for similar statement and references).
- 13 10. Pg. 4-45 The section on the effects of mechanical treatments in the Temperate Desert Ecoregion includes a statement that mechanical treatments which do not uproot vegetation would have little effect on plant species composition, other than an increase in cover of herbaceous species. The document goes on to state that shrubs would resprout fairly quickly. Big sagebrush does not resprout after mowing treatments, but rabbitbrush, desert peach, and ephedra species do. This type of treatment would favor a change in species composition toward rabbitbrush rather than sagebrush. In general, mechanical mowing treatments are not completely effective at killing sagebrush plants (Davis 1983). In this case, sagebrush plants surviving mechanical treatments will continue to grow and provide a seed source, but they do not resprout. Also mowing treatments would change species composition to favor herbaceous species rather than shrub species for several years.
- 14 11. Pg. 4-50 Only six percent of the annual graminoid or forb subclass in the Temperate Desert region is proposed for biological control methods. The document does not address the use of livestock grazing to control cheatgrass in monoculture stands or areas of dense infestation. This biological control method must be addressed in this section and added as a treatment method in the Temperate Desert ecoregion, even though BLM managers did not propose this treatment during the scoping of this document. Studies are underway in Nevada that will demonstrate the value and purpose for livestock grazing to occur on cheatgrass range as a means of cheatgrass control and wildfire presuppression.

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REFERENCES

Benson, T., H. Glimp, and B. Perryman. 2005. Pinyon-Juniper Biomass Utilization Study for Lincoln County, Nevada: 2005 Update. University of Nevada, Reno. Department of Animal Biotechnology. Prepared for the Lincoln County Regional Development Authority.

Resource Concepts, Inc. 2004. Pinyon-Juniper Biomass Utilization Study for Lincoln County, Nevada. Prepared for the Lincoln County Regional Development Authority.

USDA, Forest Service. 1983. Mechanical Control of Sagebrush. Intermountain Forest and Range Experiment Station. General Technical Report. INT-157: 49-53.

USDI, Bureau of Land Management. 2004. Pinyon Ips Beetle Outbreak. Information Bulletin No. 2004-130. August 6, 2004.

In summary, Resource Concepts, Inc. appreciates the opportunity to review the BLM Vegetation Treatment Programmatic Environmental Report and provide comments on behalf of the N-4 State Grazing Board. We are available to discuss any of the concerns or comments outlined in this correspondence.

Sincerely,



John L. McLain
CRMC/CPESC

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