



webserver@yucca-web.ymp.gov on 01/10/2008 04:33:10 PM

RRR000943

To: EIS_Comments@ymp.gov
cc:
Subject: EIS Comment

User Filed as: Not Categorized in ERMS

January 10, 2008 16:33:10

IP address: 69.144.23.24

The Commentors Name:

---> Richard C. Moore P.E.

The Commentors Address:

---> 2523 Dover Drive
---> Laramie, Wyoming 82072

Email Information:

---> Rmoore@bresnan.net
---> Add commentor to the mailing list : no

Contact Information:

---> fax number :
---> phone number : 307 742 8197
---> organization :
---> position :

Comment Text :

--> Impact on Grazing Allotments

1 [DOE has not accurately assessed the impact that construction and operation of the proposed rail line will have on grazing allotments in Nevada. DOE calculated the impact on grazing allotments by "quantifying" the amount of forage lost. This loss of forage was then converted to animal unit-months (AUM) for each grazing allotment, based upon the "footprint" of the rail line in proportion to the total area of the grazing allotment. (DEIS p. 4-44) DOE did not base the loss of animal unit-months on site specific data. Yet, DOE acknowledges that factors that influence how many animal unit-months land can support include the quantity and quality of forage, type of forage, season in which the forage will be grazed, soil, etc. (DEIS p. 4-269) DOE then goes on to dismiss the loss of forage as insignificant, because it compares the dollar value of the lost AUM's in terms of the total economy for Nye and Lincoln Counties. Finally, DOE does note that "individuals and localized areas could feel the impacts more severely." (DEIS p. 4-270)

To accurately assess the impact on grazing allotments, site specific data is essential. Much of this data is currently available through the Bureau of Land Management (BLM), who determines how many AUM's are allowed on an allotment based upon available forage. It is important to note that the location of the rail bed to local topography is also a critical factor in determining the loss of forage. Nevada is an arid state. Most drainages are ephemeral, flowing only in response to precipitation events. Most of these

events do not provide enough rainfall to cause streams to flow. Rather, as the precipitation comes down, water runs down the side slopes of drainages, soaking into the bottom lands, replenishing soil moisture in these locations. Thus, the "bottom lands" of ephemeral drainages have the most abundant forage, with less and less forage available as you climb up slope.

The rail line will preferentially be located in these same bottom lands. Thus, the construction of the rail line takes the most productive land out of production.]

2 [DOE also does not accurately reflect the length of time that forage lost due to construction impacts will be unavailable, assuming that once operations begin, there is no loss of forage. This must be based upon the erroneous assumption that reclamation of disturbed areas will occur quickly. However, in an arid environment such as Nevada, it will take many years, if ever, for the reclaimed land to reach the same level of production of forage.]

3 [The rail bed will also create an obstruction to water flow. DOE notes that "the cut and fill operations during rail line construction would cause the alteration of natural drainage patterns and runoff rates in some areas that could affect downgradient resources." (DEIS p. 4-125) In fact, the replenishment of soil moisture in bottom lands would be eliminated, resulting in much less forage productivity in areas downgradient of the rail line. Therefore, not only is forage production reduced over the life of the project, but it is also reduced over a much greater area than DOE calculated.]

DOE should accurately calculate forage loss, and the resulting economic impact on the ranchers who use the grazing allotments. Individual ranchers could be severely impacted. That impact, in turn, could have significant impacts on the local economies of the small towns in this sparsely populated area.
