Appendix A

Applicable Laws and Management Guidance

Appendix A: Applicable Laws and Management Guidance

Decisions contained in this Final EIS and RMP comply with all applicable laws, regulations, and management guidance that direct the BLM in its resource management activities. This appendix lists the major legal authorities relevant to BLM land use planning.

1. The Federal Land Policy and Management Act of 1976 (FLPMA), as amended, 43 U.S.C. 1701 et seq., provides the authority for BLM land use planning.
   a. Sec. 102 (a) (7) and (8) and 103(c) sets the policy of the United States concerning the management of BLM lands.
   b. Sec. 201 requires the Secretary of the Interior (the Secretary) to prepare and maintain an inventory of all BLM lands and their resource and other values; and, as funding and workforce are available, to determine the boundaries of the public lands, provide signs and maps to the public, and provide inventory data to State and local governments.
   c. Sec. 202 (a) requires the Secretary, with public involvement, to develop, maintain, and when appropriate, revise land use plans that provide by tracts or areas for the use of the BLM lands.
   d. Sec. 202 (c) (9) requires that land use plans for BLM lands be consistent with tribal plans and, to the maximum extent consistent with applicable Federal laws, with State and local plans.
   e. Sec. 202 (d) provides that all public lands, regardless of classification, are subject to inclusion in land use plans, and that the Secretary may modify or terminate classifications consistent with land use plans.
   f. Sec. 202 (f) and Sec. 309 (e) provide that federal agencies, state and local governments, and the public be given adequate notice and an opportunity to comment on the formulation of standards and criteria for, and to participate in, the preparation and execution of plans and programs for the management of the public lands.
   g. Sec. 302 (a) requires the Secretary to manage BLM lands under the principles of multiple use and sustained yield, in accordance with, when available, land use plans developed under Sec. 202 of FLPMA, except that where a tract of BLM lands has been dedicated to specific uses according to any other provisions of law, it shall be managed in accordance with such laws.
   h. Sec. 302 (b) recognizes the entry and development rights of mining claimants, while directing the Secretary to prevent unnecessary of undue degradation of the public lands.
   i. Sec. 505(a) requires that "...each right-of-way shall contain terms and conditions which will ... minimize damage to the scenic and esthetic values...".

2. The National Environment Policy Act of 1969 (NEPA), as amended, 42 U.S.C. 4321 et seq., requires the consideration and public availability of information regarding the environmental impacts of major federal actions significantly affecting the quality of the human environment. This includes the consideration of alternatives and mitigation of impacts.

3. The Clean Air Act of 1990, as amended, 42 U.S.C. 7418, requires federal agencies to comply with all federal, state, and local requirements regarding the control and abatement of air pollution. This includes abiding by the requirements of State Implementation Plans.

4. The Clean Water Act of 1987, as amended, 33 U.S.C. 1251, establishes objectives to restore and maintain the chemical, physical, and biological integrity of the Nation's water.

5. The Federal Water Pollution Control Act, 33 U.S.C. 1323, requires the federal land manager to comply with all federal, state, and local requirements; administrative authority; process; and sanctions regarding the control and abatement of water pollution in the same manner and to the same extent as any non-governmental entity.

6. The Safe Drinking Water Act, 42 U.S.C. 201, is designed to make the Nation's waters "drinkable" as well as "swimmable." Amendments establish a direct connection between safe drinking water, watershed protection, and management.

7. The Endangered Species Act of 1973 (ESA), as amended, 16 U.S.C. 1531 et seq.:
   a. Provides a means whereby the ecosystems upon which endangered and threatened species depend may be conserved and to provide a program for the conservation of such endangered and threatened species (Sec. 1531 [b], Purposes).
   b. Requires all federal agencies to seek the conservation of endangered and threatened species and utilize applicable authorities in furtherance of the purposes of the Endangered Species Act (Sec. 1531 [c] [1], Policy).
   c. Requires all federal agencies to avoid jeopardizing the continued existence of any species that is listed or proposed for listing as threatened or endangered or destroying or adversely modifying its designated or proposed critical habitat (Sec. 1536 [a], Interagency Cooperation).
   d. Requires all federal agencies to consult (or confer) in accordance with Sec. 7 of the Endangered Species Act with the Secretary of the Interior, through the Fish and Wildlife Service and/or the National Marine Fisheries Service, to ensure that any federal action (including land use plans) or activity is not likely to jeopardize the continued existence of any species listed or proposed to be listed under the provisions of the Endangered Species Act, or result in the destruction or adverse modification of designated or proposed critical habitat (Sec. 1536 [a], Interagency Cooperation, and 50 CFR 402).

8. The Wild and Scenic Rivers Act, as amended, 16 U.S.C. 1271 et seq., requires the federal land management agencies to identify river systems and then study them for potential designation as wild, scenic, or recreational rivers.

9. The Wilderness Act, as amended, 16 U.S.C. 1131 et seq., authorizes the President to make recommendations to the Congress for federal lands to be set aside for preservation as wilderness.

10. The Antiquities Act of 1906, 16 U.S.C. 431-433, protects cultural resources on federal lands and authorizes the President to designate national monuments on federal lands.

11. The National Historic Preservation Act (NHPA), as amended, 16 U.S.C. 470, expands protection of historic and archaeological properties to include those of national, state, and local significance and directs federal agencies to consider the effects of proposed actions on properties eligible for or included in the National Register of Historic Places.

12. The American Indian Religious Freedom Act of 1978, 42 U.S.C. 1996, establishes a national policy to protect and preserve the right of American Indians to exercise traditional Indian religious beliefs or practices.

13. Federally Recognized Tribes and Tribal Reserved Rights - Federally recognized tribes are sovereign nations that maintain a unique government to government and trust relationship with the United States (American Indian Resources Institute 1988:26). The trust relationship is essentially one in which Indian tribes trust the federal government to honor the reserved rights made in treaties or other agreements in exchange for Indian lands[1].

    In the past, this relationship has been acknowledged in one of three ways; by treaty ratification, Congressional Act, or executive order[2]. The various treaties, congressional acts, and executive orders that have been crafted during the past 150 years have established a unique legal relationship with the three federally recognized tribes and the United States government. Part of that legal relationship may be found in the tribes' reserved rights and privileges to harvest and utilize traditional resources, to visit and maintain sacred sites, and to participate in ceremonies that preserve the essential elements of their culture. Those resources and sacred sites, located on ancestral lands and ceded to the federal government, now constitute a large part of the public domain.

14. The Recreation and Public Purposes Act of 1926, as amended, 43 U.S.C. 869 et seq., authorizes the Secretary of the Interior to lease or convey BLM lands for recreational and public purposes under specified conditions.

15. The Surface Mining Control and Reclamation Act of 1977, 30 U.S.C. 1201 et seq., requires application unsuitability criteria prior to coal leasing and also to proposed mining operations for minerals or mineral materials other than coal.

16. The Mineral Leasing Act of 1920, as amended, 30 U.S.C. 181 et seq., authorizes the development and conservation of oil and gas resources.

17. The Onshore Oil and Gas Leasing Reform Act of 1987, 30 U.S.C. 181 et seq., stipulates that:
    a. Potential oil and gas resources be adequately addressed in planning documents;
    b. The social, economic, and environmental consequences of exploration and development of oil and gas resources be determined; and
    c. Any stipulations to be applied to oil and gas leases be clearly identified.

18. The General Mining Law of 1872, as amended, 30 U.S.C. 21 et seq., allows the location, use, and patenting of mining claims on sites on public domain lands of the United States.

19. The Mining and Mineral Policy Act of 1970, 30 U.S.C. 21a, establishes a policy of fostering development of economically stable mining and minerals industries, their orderly and economic development, and studying methods for disposal of waste and reclamation.

20. The Materials Act of 1947, as amended (30 U.S.C. 601–604, et seq.), provides for the sale of common variety materials for personal, commercial, or industrial uses and for free use for local, state, and federal governmental entities. The sales of mineral materials are controlled by the regulations listed in 43 CFR 3600.

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[1] Pevar, S.L. 1992. The Rights of Indians and Tribes: The Basic American Civil Liberties Union Guide to Indian and Tribal Rights. Southern Illinois University Press, Carbondale and Edwardsville.

[2] Zucker, J., K. Hummel, and B. Hogfoss. 1983. Oregon Indians: Culture, History and Current Affairs, an Atlas and Introduction. Western Imprints, the press of the Oregon Historical Society. Portland.

21. The Taylor Grazing Act of 1934, 43 U.S.C. 315, "[T]he Secretary of the Interior is authorized, in his discretion, by order to establish grazing districts or additions thereto... of vacant unappropriated and unreserved lands from any part of the public domain...which in his opinion are chiefly valuable for grazing and raising forage crops[.]..." The Act also provides for the classification of lands for particular uses.

22. The Public Rangelands Improvement Act of 1978, 43 U.S.C. 1901, provides that the public rangelands be managed so that they become as productive as feasible in accordance with management objectives and the land use planning process established pursuant to 43 U.S.C. 1712.

23. The Wild Free Roaming Horse and Burro Act of 1971, 43 U.S.C 1331–1340, provides for the management, protection, and control of wild horses and burros on public lands and authorizes "adoption" of wild horses and burros by private individuals. Regulations applicable to wild horse and burro management on BLM-administered lands are provided in 43 CFR 4700.

24. The Archaeological Resources Protection Act of 1979, 16 U.S.C. 470, secures the protection of archaeological resources and sites which are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data which were obtained before October 31, 1979.

25. The Native American Graves Protection and Repatriation Act of 1990, 25 U.S.C. 3001, addresses the rights of lineal descendants, Indian tribes, and Native Hawaiian organizations to Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. It requires federal agencies and museums to provide information about Native American cultural items to parties with standing and, upon presentation of a valid request, dispose of or repatriate these objects to them.

26. The Migratory Bird Conservation Act of 1979, as amended, 16 U.S.C. 715 et seq., establishes a Migratory Bird Conservation Commission to approve areas recommended by the Secretary of the Interior for acquisition with Migratory Bird Conservation Funds.

27. The Bald Eagle Protection Act of 1973, 16 U.S.C. 668, establishes the eagle as a protected species.

28. The Energy Policy and Conservation Act Reauthorization of 2000, as amended, Public Law 106–469. For more information, please visit: http://www.doi.gov/epca/.

29. The National Trails System Act of 1968, as amended (16 U.S.C. 1241–1249), establishes a national trails system and requires that federal rights in abandoned railroads be retained for trail or recreation purposes, or sold with the receipts to be deposited in the Land and Water Conservation Fund.

30. Executive Order 11644 as amended by Executive Order 11989 (Off-Road Vehicles on Public Lands) established policies and procedures for controlling the use of off-road vehicles on public lands.

31. Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), 49 Fed. Reg. 7629, requires that each federal agency consider the impacts of its programs on minority populations and low income populations.

32. Executive Order 13007 (Indian Sacred Sites), 61 Fed. Reg. 26771, requires federal agencies to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions to:
    a. Accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners; and
    b. Avoid adversely affecting the physical integrity of such sacred sites.

33. Executive Order 13084 (Consultation and Coordination with Indian Tribal Governments) provides, in part, that each federal agency shall establish regular and meaningful consultation and collaboration with Indian tribal governments in the development of regulatory practices on federal matters that significantly or uniquely affect their communities.

34. Executive Order 13112 (Invasive Species) provides that no federal agency shall authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species unless, pursuant to guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk or harm will be taken in conjunction with the actions.

35. Executive Order 11990 (Protection of Wetlands) requires federal agencies to take action to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands.

36. Executive Order 11988 (Floodplain Management) provides for the restoration and preservation of national and beneficial floodplain values, and enhancement of the natural and beneficial values of wetlands in carrying out programs affecting land use.

37. Executive Order 13186 (Migratory Birds) establishes the responsibilities of federal agencies to protect migratory birds.

38. Secretarial Order 3175 (incorporated into the Departmental Manual at 512 DM 2) requires that if Department of the Interior agency actions might impact Indian trust resources, the agency explicitly address those potential impacts in planning and decision documents, and the agency consult with the tribal government whose trust resources are potentially affected by the federal action.

39. Secretarial Order 3206 (American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act) requires Department of the Interior agencies to consult with Indian tribes when agency actions to protect a listed species, as a result of compliance with the Endangered Species Act, affect or may affect of Indian lands, tribal trust resources, or the exercise of American Indian tribal rights.

40. Executive Order 12548 provides for establishment of appropriate fees for the grazing of domestic livestock on public rangelands and directs that the fee shall not be less than $1.35 per animal unit month.

APPENDIX B

Record of Decision
Northeastern California
and
Northwestern Nevada

STANDARDS
for Rangeland Health

and

GUIDELINES
for Livestock Grazing Management

Prepared by the Bureau of Land Management
California State Office
June 1999

ABSTRACT

NE California and NW Nevada

Standards for Rangeland Health and Guidelines for Livestock Grazing Management

Draft ( ) Final( ) Record of Decision (X)

United States Department of the Interior, Bureau of Land Management (BLM)

1 Type of Action: Administrative (X) Legislative ( )

2 Abstract: This is the Record of Decision for the environmental impact statement (EIS) documenting the effects of adopting regional standards for rangeland health and guidelines for livestock grazing management on BLM-administered lands in parts of California and NW Nevada. This Record of Decision covers that part of California and Nevada formerly known as the Susanville District.

The Preferred Alternative described in the final EIS (Alternative 5), with modifications for clarification, has been chosen as the Standards and Guidelines for California. The changes reflected in this Decision are within the scope and analysis of the EIS.
There Standards and Guidelines will be recommended to the Secretary of the Interior for final approval. They will take effect immediately upon that approval.

This document contains the actual Decision establishing Rangeland Health Standards and Guidelines for California and NW Nevada. It includes the following:

-Decision on Plan Amendments
-Standards and Guidelines for NE California and NW Nevada (formerly the Susanville District)

-Implementation
-Assessments and Monitoring

Al Wright 6.14.99

Al Wright, Acting State Director Date Bureau of Land Management California State Office

SUMMARY

This is the Record of Decision (Decision) recommending Rangeland Health Standards and Livestock Grazing Management Guidelines for NE California and NW Nevada. These recommendations will be submitted to the Secretary of the Interior (Secretary) for his approval, and will become effective immediately upon that approval.

The Decision amends BLM land use plans in NE California and NW Nevada to include the Standards and Guidelines and directs evaluation of existing, and development of new, Desired Plant Community (DPC) standards to ensure conformance of the DPCs with the Standards.

The Decision selects the Preferred Alternative described in the final EIS (Alternative 5), with minor changes for clarification, as the Rangeland Health Standards and Guidelines to be submitted to the Secretary for his approval.

The Decision describes how the Standards and Guidelines will be implemented and how rangeland health conditions will be monitored to assure achieving the Standards.

For further information contact:

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Map 2 --Map Showing the RAC Areas -- Central California, Northwestern California, and Northeastern California and Northwestern Nevada

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1. **Implementation**
2. **Assessments and Monitoring**

DECISION

1. INTRODUCTION

There were five alternatives considered and analyzed in the EIS. Alternative 1 consisted of the standards and guidelines developed by the three Resource Advisory Councils (RACs) for their representative areas. Alternative 2 consisted of the state-wide standards developed by BLM, in consultation with representatives from each of the RACs, but without concurrence by the entire RAC membership. The guidelines for Alternative 2 were essentially the same as those for Alternative 1. Alternative 3 was adoption of the national "fall-back" standards and guidelines listed in the regulations. Alternative 4 (the environmentally preferred alternative) was a rapid improvement or rapid recovery alternative developed by BLM, with suggestions from several interest groups. The Standards in Alternative 4 were the same as those in Alternative 2, except for Water Quality; however, the implementation would have occurred much faster than under other alternatives. Alternative 5 was a modified version of Alternative 1, with changes based upon suggestions and new information from the public, the RACs, and BLM.

The Decision is to select Alternative 5, with some minor changes and clarifications, all of which are within the scope of the analysis. This decision will become effective immediately upon approval by the Secretary of the Interior.

This Alternative was selected for a number of reasons, including (1) it meets the requirements of the regulations at 43 CFR 4180.1 and 4180.2 to address the principles of rangeland health; (2) it was based upon and incorporates a large portion of the regional standards and guidelines recommended by the Resource Advisory Council; (3) it incorporates some good suggestions by other agencies and the public; (4) it is based upon sound science as requested repeatedly by the different parties who commented on the process; and (5) it can be implemented within BLM’s existing budgets without undue economic impacts to the grazing operators and the surrounding communities.

2. PLAN AMENDMENTS

In accordance with the grazing administration regulations at 43 CFR 4100, existing land use plans (Resource Management Plans and Management Framework Plans) have been examined to determine their compliance with the new regulations and the principles of rangeland health. In most cases, these plans do comply.

The land use plans identified below, as well as allotment management and other activity level plans, are hereby amended to include the standards and guidelines as adopted in this decision. The standards and guidelines will become effective immediately upon approval by the Secretary of the Interior and will be incorporated into the Plans at that time. Where there are plan decisions that are contrary to the new regulations, the principles of rangeland health, and the standards and guidelines, those decisions will be deleted from the plans or amended to comply.

Where "desired plant community" (DPC) objectives have been determined through the BLM planning and NEPA processes, the DPCs will be evaluated to ensure they meet the standards of rangeland health. Where DPCs have not yet been determined for a pasture or allotment, they will be developed through the BLM planning and NEPA processes to meet local and regional management objectives, and the standards of rangeland health.

Each Field Office will make the physical changes to their land use plans prior to the next grazing season. As this is merely plan maintenance, further NEPA analysis will not be necessary to complete this administrative action.

LAND USE PLAN	PLAN DATE	FIELD OFFICE
Tuledad / Home Camp Management Framework Plan (MFP)	1978	Surprise -- south part
Cowhead / Massacre MFP	1980	Surprise -- north part
CAL / NEVA MFP	1982	Eagle Lake -- NE part
Willow Creek MFP	1983	Eagle Lake -- NW part
Honey Lake MFP	1983	Eagle Lake -- south part
Eagle Lake MFP Amendment	1990	Eagle Lake -- Eagle Lake area
Alturas Resource Management Plan	1983	Alturas -- most of area
Ash Valley Amendment		Alturas -- part only
Mount Dome MFP	1981	Alturas -- part only
Redding (old) MFP	1983	Alturas -- part only

3. STANDARDS AND GUIDELINES for RANGELAND HEALTH in NORTHEASTERN CALIFORNIA and NORTHWESTERN NEVADA

The Preferred Alternative described in the final EIS (Alternative 5), with minor changes for clarification, has been chosen as the Standards and Guidelines for Northeastern California and Northwestern Nevada. The changes reflected in this Decision are within the scope and analysis of the EIS. These Standards and Guidelines will take effect immediately upon their approval by the Secretary of the Interior.
These standards and guidelines were developed for, and are hereby adopted for, that part of northeastern California and northwestern Nevada formerly known as the Susanville District.

Preamble

Healthy rangelands contribute to the social and economic well being of rural communities in Northeastern California and Northwestern Nevada, and they provide, over the long term, the most reliable harvest of rangeland resources. The objective of rangeland resource planning is to integrate BLM resources with other resources to achieve the mandate of multiple-use and sustained yield management of renewable resources in an environmentally sound and cost-effective manner.

The **Standards** of rangeland health are expressions of physical and biological condition or degree of function required for healthy, sustainable rangelands. The Standards are applied on a landscape scale. Some standards may not apply to all acres. For example, a mosaic of vegetation types and age classes may produce the diversity associated with healthy rangelands; however, some individual vegetation communities within the mosaic may lack diversity.

The Standards always relate to the capability or potential of a specific site. The land will not be expected to produce vegetation or support habitats not attainable due to climate, soils, or other limiting attributes. In instances where site capability or potential has changed due to human-caused or natural disturbance, recognition will be given to the modified capability when setting or assigning a standard to (for) the site. The Standards are designed to establish the threshold for healthy rangelands.

In some circumstances, an exception to the Standards or Guidelines may be necessary or unavoidable; however, **these instances should be under extreme conditions only** and fully justified (documented) in order to be acceptable.

The **Guidelines** for grazing management are the types of grazing management methods and practices determined to be appropriate to ensure that standards can be met or that significant progress can be made toward meeting the standard. The Guidelines were designed to provide direction, yet offer flexibility for implementation through activity plans and terms and conditions for grazing permits. The Bureau of Land Management (BLM) must operate within the constraints of other regulatory requirements that may affect how standards and guidelines are applied for livestock grazing, for example the Wild Free-Roaming Horse and Burro Act (1971).

STANDARD 1: UPLAND SOILS

Upland soils exhibit infiltration and permeability rates that are appropriate to soil type, climate and landform, and exhibit functional biological, chemical and physical characteristics.

Meaning that:

Precipitation is able to enter the soil surface and move through the soil profile at a rate appropriate to soil type, climate, and landform; the soil is adequately protected against human-caused wind or water erosion; and the soil fertility is maintained at, or improved to, the appropriate level.

Criteria to Meet Standard:

* Ground cover (vegetation, litter, and other types of ground cover such as rock fragments) is sufficient to protect sites from accelerated erosion.
* Evidence of wind and water erosion, such as rills and gullies, pedestaling, scour or sheet erosion, and deposition of dunes is either absent or, if present, does not exceed what is natural for the site.
* Vegetation is vigorous, diverse in species composition and age class, and reflects the potential natural vegetation or desired plant community for the site.

STANDARD 2: STREAMS

Stream channel form and function are characteristic for the soil type, climate, and landform.

Meaning that:

Channel gradient, pool frequency, width to depth ratio, roughness, sinuosity, and sediment transport are able to function naturally and are characteristic of the soil type, climate, and landform.

Criteria to Meet Standard:

* Gravel bars and other coarse textured stream deposits are successfully colonized and stabilized by woody riparian species.
* Stream bank vegetation is vigorous and diverse, mostly perennial, and holds and protects banks during high stream flow events.
* The stream water surface has a high degree of shading, resulting in cooler water in summer and reduced icing in winter.
* Portions of the primary floodplain are frequently flooded (inundated every 1-5 years).

STANDARD 3: WATER QUALITY

Water will have characteristics suitable for existing or potential beneficial uses. Surface and groundwater complies with objectives of the Clean Water Act and other applicable water quality requirements, including meeting the California and Nevada State standards, excepting approved variances.

Management Objective: For water bodies, the primary objective is to maintain the existing quality and beneficial uses of water protect them where they are threatened, and restore them where they are currently degraded. This objective is of even higher priority in the following situations:

a. where beneficial uses of water bodies have been listed as threatened or impaired pursuant to Section 303(d) of the Federal Clean Water Act;

b. where aquatic habitat is present, has been present, or is potentially present for Federal threatened or endangered, candidate, and other special status species dependent on water resources; and

c. in designated water resource sensitive areas such as riparian and wetland areas.

Meaning That:

BLM will:

Maintain the physical, biological, and chemical integrity of waters flowing across or underlying the lands it administers.

Protect the integrity of these waters where it is currently threatened.

Insofar as is feasible, restore the integrity of these waters where it is currently impaired.

Not contribute to pollution and take action to remedy any pollution resulting from its actions that violates California and Nevada water quality standards, Tribal water quality standards, or other applicable water quality requirements (e.g., requirements adopted by SWRCB or RWQCB in California, or U.S. EPA pursuant to Section 303(d) of the Clean Water Act or the Coastal Zone Reauthorization Act). Where action related to grazing management is required, such action will be taken as soon as practicable but not later than the start of the next grazing year (in accordance with 43 CFR 4180.1).

Be consistent with the non-degradation policies as identified by the States.

Develop and execute a Management Agency Agreement with the States of California and Nevada for the efficient protection of water quality associated with BLM's management.

Work with the States' water quality administrative agencies and U.S. EPA to establish appropriate beneficial uses for public waters, establish appropriate numeric targets for 303(d) listed water bodies, and implement the applicable requirements to ensure that water quality on public lands meets the objectives for the designated beneficial uses of the water.

Develop and implement Best Management Practices (BMPs) approved by the States to protect and restore the quality and beneficial uses of water, and monitor both implementation and effectiveness of the BMPs. These BMPs will be developed in full consultation, coordination, and cooperation with permittees and other interests.

State or Tribal approved variances or exceptions to water quality standards may be applicable within their Basin Plans for specific types of activities or actions. BLM will follow State or Tribal administrative procedures associated with variances.

As Indicated By:

* The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., indicator macroinvertebrates, fish, algae, and plants).
* Achievement of the standards for riparian, wetlands, and water bodies.
* Monitoring results or other data that show water quality is meeting the standard.

STANDARD 4: RIPARIAN and WETLAND SITES

Riparian and Wetland areas are in properly functioning condition and are meeting regional and local management objectives.

Meaning that:

The riparian and wetland vegetation is controlling erosion, stabilizing stream banks, shading water areas to reduce water temperature, filtering sediment, aiding in floodplain development, dissipating energy, delaying floodwater and increasing recharge of ground water that is characteristic for these sites. Vegetation surrounding seeps and springs is controlling erosion and reflects the potential natural vegetation for the site.

Criteria to Meet Standard:

Riparian vegetation is vigorous and mostly perennial, and diverse in species composition, age class and life form sufficient to stabilize stream banks and shorelines.
Riparian vegetation and large woody debris are well anchored and capable of withstanding high stream flow events.
Negligible accelerated erosion as a result of human related activities is evident.
Age class and structure of woody riparian and wetland vegetation are appropriate for the site.

Exceptions and Exemptions to Standard 4 (where Standard 4 is not applicable)

- Structural facilities constructed for livestock/wildlife water or other purposes are not natural wetland and/or riparian areas. Examples are: water troughs, stock ponds, flood control structures, tailings ponds, water gaps on fenced or otherwise restricted stream corridors, etc.

STANDARD 5: BIODIVERSITY

Viable, healthy, productive and diverse populations of native and desired plant and animal species, including special status species, are maintained.

Meaning that:

Native and other desirable plant and animal populations are diverse, vigorous, able to reproduce, and support nutrient cycles and energy flows.

Criteria to Meet Standard:

* Wildlife habitats include seral stages, vegetation structure, and patch size to promote diverse and viable wildlife populations.
* A variety of age classes is present for most species.
* Vigor is adequate to maintain desirable levels of plant and animal species to ensure reproduction and recruitment of plants and animals when favorable events occur.
* Distribution of plant species and their habitats allow for reproduction and recovery from localized catastrophic events.
* Natural disturbances such as fire are evident, but not catastrophic.
* Non-native plant and animal species are present at acceptable levels.
* Habitat areas are sufficient to support diverse, viable, and desired populations and are connected adequately with other similar habitat areas.
* Adequate organic matter (litter and standing dead plant material) is present for site protection and decomposition to replenish soil nutrients and maintain soil health.

GUIDELINES FOR LIVESTOCK GRAZING

The following guidelines are meant to apply to one or more of the standards for rangeland health.

Guideline 1: Adequate stubble will be present on all stream-side areas at the end of the growing season, or at the end of the grazing season if grazing occurs after fall dormancy. The residual or regrowth should provide sufficient herbaceous forage biomass to meet the requirement of plant vigor maintenance, bank protection, and sediment entrapment. Stubble height thresholds will be set on a site-specific basis, except for those allotments to which Guideline 16 applies (see Guideline 16 for an explanation of when Guideline 16 applies).

Utilization of stream-side herbaceous and woody plants should be limited to a specified amount of the current growth, and/or livestock should be removed to allow sufficient time for plant regrowth.

a. Late season use (summer or fall grazed pastures) requires more restrictive utilization based on site specific situations.

b. Special situations such as fragile fisheries habitats or easily eroded stream banks may require more restrictive utilization thresholds.

c. Hoof action impacts or chiseling on stream banks will not exceed specified thresholds so that stream bank stability is maintained or improved.

Guideline 2: Desired seral states will be determined through the Allotment Management Plan development process; generally the goal will be to achieve advanced ecological status in the riparian zone, except where site-specific objectives call for lower ecological status (such as meadows in important sage grouse habitat, where the objective might call for a pattern of meadows in different seral stages from mid-seral to the potential natural community). These site-specific objectives will be determined through allotment management plans or other plans and analyzed through the NEPA process.

Guideline 3: Periods of rest from livestock grazing or other avoidable disturbances must be provided during/after periods of stress on the land (e.g.: fire, flood, drought) and during critical times of plant growth.

Guideline 4: Plans for grazing on any allotment must consider other uses (recreation, archaeological sites, wildlife, horses and burros, mineral resource extraction, etc.) and be coordinated with the other users of public lands so that overall use does not detract from the goal of achieving rangeland health.

Guideline 5: Intensity, frequency, season-of-use, and distribution of grazing shall provide for growth and reproduction of desired plant species and the achievement of the potential natural vegetation or desired plant community.

Guideline 6: Grazing permits will include site-specific, measurable terms and conditions.

Guideline 7: Design and work towards implementation of a grazing management strategy for livestock for each grazing unit (pasture) within I (Improvement) and M (Maintenance) category allotments, to maintain or improve rangeland health. This may consist of, but not be limited to, season-of-use, rotation, or by setting utilization levels for desirable plants. Each management plan implemented will incorporate the factors necessary to maintain the health of desirable plants.

Guideline 8: Determination of grazing use by livestock must provide for the habitat requirements of fish and wildlife.

Guideline 9: Grazing management practices must sustain biological diversity across the landscape. A mosaic of seral stages, vegetation corridors, and minimal habitat fragmentation must be maintained.

Guideline 10: Take aggressive action to reduce the invasion of undesirable exotic plant species into native plant communities. The spread of noxious weeds will be controlled through appropriate methods such as grazing management, fire management, and other management practices.

Guideline 11: Prescribed fire and (natural) prescribed fire will be utilized to promote a mosaic of healthy plant communities and vegetative diversity.

Guideline 12: Grazing and other management practices shall take advantage of transitional opportunities (e.g., drought, flood, fire) to enhance or establish populations of desirable tree, shrub, herbaceous and grass species. Utilization levels will be established for desired seedlings, saplings, and/or mature plants to promote their presence in the plant community.

Guideline 13: Development of springs, seeps, and other water related projects shall be designed to promote rangeland health. Wherever possible, water sources shall be available year long for use by wildlife.

Guideline 14: Apply the management practices recognized and approved by the States of California and Nevada as Best Management Practices (BMPs) for grazing related activities to protect and maintain water quality.

Guideline 15: In watersheds draining into water bodies that have been listed or are proposed for listing as having threatened or impaired beneficial uses, and where grazing activities may contribute to the pollutants causing such impairment, the management objective is to fully protect, enhance, and restore the beneficial uses of the water.

Guideline 16: Utilization Levels to be Applied to those Allotments Not Meeting or Making Significant Progress Toward Meeting the Standards

If monitoring or documented observation indicates that one of more of the standards is not being met, and if significant progress is not being made toward meeting all of those standards that are not being met, and if there is evidence that current grazing practices are causing or contributing to this unsatisfactory condition, then the following utilization levels will be applied.

Utilization of key upland herbaceous species

UTILIZATION GUIDELINES (adapted from Holechek 1988 and Holechek et al. 1998)	
Community Type	Percent of Use of Key Herbaceous Species
Salt desert shrubland	25-35
Semi-desert grass and shrubland	30-40
Sagebrush grassland	30-40
California annual grassland	50-60*
Perennial grass communities within the California annual grassland vegetation type	30-40
Coniferous forest	30-40
Mountain shrubland	30-40
Oak woodland	30-40
Pinyon-juniper woodland	30-40
Alpine tundra	20-30

* Residual dry matter (RDM) guidelines will be used instead of these utilization levels for management of annual species in the California annual grassland. These RDM levels correspond approximately with these utilization levels. The RDM levels given in the table in the Final EIS under Alternative 5, Ukiah RAC Recommended Standards and Guidelines (Section 2.92), will be used for those few annual allotments within the area covered by this ROD.

Utilization of key upland browse species

There will be no more than 20 percent utilization of annual growth on key browse species prior to October 1 within identified deer concentration areas. These concentration areas are those areas within mule deer habitat where mule deer numbers are most likely to be concentrated during the winter season (winter season normally occurs from December 16 through March 31). These areas have been identified through State Fish and Game Agency fall and spring counts over a period of several years. Maps of these deer concentration areas are on file at the BLM Eagle Lake Field Office.

Utilization of key riparian species

A 4-6 inch minimum stubble height will remain at the end of the growing season in most riparian areas. There should be no more than 20% utilization on key riparian trees and shrub species in those areas where the presence of woody riparian species is necessary to meet standards.

Application of the above utilization levels

These utilization guidelines will be applied to those areas of the allotment responsible for the determination that the allotment is not meeting the standards. For example, an allotment has 10 riparian areas, of which 6 have been determined to be in proper functioning condition and 4 have been determined to be functional–at risk. The utilization guidelines for riparian species given above would be applied to the 4 riparian areas that are functional–at risk, not to the 6 that are in proper functioning condition (although *all* of the riparian areas will be managed to meet the standards). Also, only those guidelines that are applicable to making progress toward meeting the standards that are not being met would be applied. For example, if only riparian standards are not being met, then only the guidelines applicable to utilization and stubble height of riparian vegetation would be applied.

These utilization levels will be implemented unless and until a current site-specific analysis is completed and new utilization levels are developed for specific allotments and documented in allotment management plans, other management plans, and/or in terms and conditions of grazing permits/leases. New site-specific utilization levels that are developed may be more restrictive than the guidelines presented above, consistent with achieving the desired resource conditions (as prescribed in land use plans and activity plans) and progress toward meeting the standards.

Implementation of this guideline

1. Uplands (including perennial grass and browse communities).

Guideline 16 will be implemented only on those upland areas that are responsible for the determination that the allotment is not meeting one or more of the standards and for which lighter utilization would be expected to move these areas toward meeting the standard(s).

Management changes (such as changes in season of use, timing, duration, and/or intensity; rotational grazing; fencing; herding; and/or adjustments in stocking rates) will be implemented if utilization guidelines on the average of the upland key areas across the pasture (or allotment if there is only one pasture) are exceeded for 2 consecutive years or in any 2 years out of every 5 years. In addition, at least 70% of upland key areas on the pasture (or allotment) are not to exceed maximum utilization guidelines in most years. Because of the potential long-term damage to perennial grass species associated with severe grazing, severe grazing use (>70% utilization) in any upland key area in any year will result in a management change the following year. If any particular key area fails to meet the guidelines for more than 2 consecutive years, then management action will be taken to remedy the problem in the area of the allotment that key area represents. The average (mean) utilization on key species will be estimated at each key area and used to determine if the guidelines have been met. There are indications that the median may be a better statistic to use than the mean; we will calculate both statistics from the same data sets and make a determination on which statistic to use after examining the data over a period of a few years. See Appendix 20 of the Final EIS for further discussion on this issue.

The management options to be implemented to meet this guideline will be determined in full consultation, cooperation, and coordination with affected permittees and other interests.

For allotments not meeting or making significant progress toward meeting the standards (and for which lower utilization levels of perennial upland species would be expected to help move these allotments toward the standards), utilization data already in hand will be used to determine whether a management change is necessary. Thus, for example, if utilization on a particular key area has exceeded the thresholds for the two years previous to the approval of these standards and guidelines, a management change will be implemented prior to the first grazing year following this approval. In addition to implementing management changes that are expected to bring utilization levels within threshold values, close monitoring will follow to ensure that the grazing use levels are not exceeded during the grazing period following the management changes. If utilization levels are exceeded or expected to be exceeded during this period, a reduction or curtailment of further grazing in the area represented by the key area will be required for the remainder of the grazing season. In addition, further management changes will be implemented prior to the start of the next grazing season to bring utilization levels within thresholds.

2. Riparian areas (including herbaceous and woody plant communities).

Guideline 16 will be implemented only on those riparian areas that are nonfunctional or functional--at risk and lighter utilization levels would be expected to move these areas toward meeting the standards. The guideline will apply where the riparian area in a healthy state has the capability to produce vegetation of the prescribed height. The stubble heights will be measured at the end of the growing season to determine if the guideline has been met. Management changes (such as changes in season of use, timing, duration, and/or intensity; rotational grazing; fencing; herding; and/or adjustments in stocking rates) will be implemented if stubble heights on the average of the key riparian areas across the pasture (or allotment if there is only one pasture) fall below the guidelines for 2 consecutive years or in any 2 years out of every 5 years. In addition, at least 70% of riparian key areas on the allotment are to exceed minimum stubble heights in most years. If any particular key area fails to meet the guidelines for more than 2 consecutive years, then management action will be taken to remedy the problem in the area of the allotment that key area represents.

Because stream banks may be inadequately protected by heavy use in any one year and because stubble heights below 3 inches result in cattle shifting their preference to shrubs, stubble heights below 2 inches in any one year will require a management change in the following year.

The mean stubble height on key riparian species will be estimated at each riparian key area and used to determine if the guidelines have been met. There are indications that the median may be a better statistic to use than the mean; we will calculate both statistics from the same data sets and make a determination on which statistic to use after examining the data over a period of a few years. See Appendix 20 of the Final EIS for further discussion on this issue.

For allotments not meeting or making significant progress toward meeting the standards (and for which higher stubble would be expected to help move these allotments toward the standards), stubble height data already in hand will be used to determine whether a management change is necessary. Thus, for example, if stubble heights on a particular key area have fallen below the thresholds for the two years previous to the approval of these standards and guidelines, a management change will be implemented prior to the first grazing year following this approval. In addition to implementing management changes that are expected to bring stubble heights within threshold values, close monitoring will follow to ensure that the grazing use levels are not exceeded during the grazing period following the management changes. If utilization levels are exceeded or expected to be exceeded during this period, a reduction or curtailment of further grazing in the area represented by the key area will be required for the remainder of the grazing season. In addition, further management changes will be implemented prior to the start of the next grazing season to bring utilization levels within thresholds.

The management options to be implemented to meet this guideline will be determined in full consultation, coordination, and cooperation with affected permittees and other interests.

If reductions in permitted use are required

Any reductions in permitted use required as a result of implementing this guideline will be held in suspension and apportioned back to the permittee(s) or lessee(s) authorized to graze in the affected allotment if rangeland health improves to the extent that the authorized officer determines additional forage to be available (see Implementation, Appendix 1, for more information on this).

Guideline 17: Rangeland monitoring to determine utilization of forage resources and trend of rangeland health will be conducted in each allotment based on current accepted practices and techniques as directed in the Interagency Technical References: *Utilization Studies and Residual Measurements* (BLM et al. 1996b) and *Sampling Vegetation Attributes* (BLM et al. 1996a). Monitoring methodologies will be applicable to local conditions and developed in consultation with permittees and interested publics.

To the extent possible, monitoring methods will be simple and easily accomplished. BLM, permittees, or others will do the monitoring. BLM will be responsible for ensuring that the monitoring is conducted in accordance with currently accepted practices and techniques, for analyzing and interpreting the data collected (in consultation, coordination, and cooperation with affected permittees and other interests), and for the accuracy of the data.

Existing key areas will be used where they exist. New key areas will be selected in full consultation, coordination, and cooperation with affected permittees and other interests. BLM will periodically review established key areas to determine if they continue to be appropriate to management. This review will be done in full consultation, coordination, and cooperation with affected permittees and other interests. If there is disagreement between BLM, permittees, and other interests over the location of key areas, the RAC will be asked for ideas on resolution. The final decision on the placement of key areas, however, rests with BLM.

BLM, in cooperation with other agencies, including Cooperative Extension, the Natural Resources Conservation Service, and the Forest Service, will provide training for permittees and other interested parties on rangeland monitoring methods.

4. IMPLEMENTATION

BLM will fully implement the grazing standards and guidelines as directed in the rulemaking. The rule states that, “The authorized officer shall take appropriate action as soon as practicable but not later than the start of the next grazing year upon determining that grazing practices or levels of grazing use on public lands are significant factors in failing to achieve the standards and conform to the guidelines....”(43 CFR 4180.2(c)).

Determination of the “appropriate action,” and the actual scheduling of the implementation, will be the responsibility of the local Field Managers. However, it will be done using the priority system described in Appendix 1.

5. ASSESSMENTS and MONITORING

Field Offices will conduct assessments of all allotments according to the priority described in Appendix

1. These assessments will be done using an interdisciplinary approach, and the findings and reasons for the findings will be documented. The format and content of this documentation will be left to the discretion of the individual Field Manager. (Examples are in the Final EIS.)

Field Offices will monitor allotments according to the priority described in Appendix 1. The monitoring will be done using an interdisciplinary approach, using methods described in Appendix 2. Also see Guideline 17. Both assessments and monitoring will be done in consultation, coordination, and cooperation with permittees and other interests.

Rangeland health conditions will be reported annually for each grazing allotment. This information will include the determinations of rangeland health conditions through assessments and monitoring and the progress made towards meeting rangeland health standards. Specifically, for each allotment an identification will be made of what standards, if any, are not met or where significant progress is not being made toward meeting the standard; what progress has been made regarding determining and implementing needed management changes; and the results of making the management changes as determined from monitoring information. Additionally, any changes in the management categories of the allotments will be identified and an explanation of the reasons for the change will be made.

The above information will be gathered at the Field Office which administers the respective allotment(s). A summary of this information will be consolidated for all of the allotments in the state (exclusive of the California Desert District) and made available to the public annually.

6. PUBLIC INVOLVEMENT and RESPONSE to PROTESTS

BLM has had extensive public involvement throughout the process of developing the Standards and Guidelines. Early phases of this involvement were described in the Draft EIS, and in Chapter 5 of the Final EIS. Further, we have consulted extensively with the three Resource Advisory Councils (RAC) on content and wording of the Standards and Guidelines.

As stated in the Final EIS, “following the comment period on the draft EIS, the RAC members were sent copies of all of the comment letters. The RACs discussed the comments and the draft EIS in their meetings. Representatives of the three RACs then met with BLM staff in a workshop setting and made recommendations for modification of their original proposals.”

Comments made by the public following the Draft EIS were individually analyzed by BLM, and responded to in the Final EIS. The Proposed Action (Alternative 5) in the Final EIS was based upon the original RAC proposals, with changes suggested by the RACs and by BLM, based upon analysis of the public comments. There were several meetings with the Susanville RAC and other interested parties prior to issuing the Final EIS because there were items in the Standards and Guidelines that caused concern to RAC members and ranchers in NE California and NW Nevada.

Following release of the Final EIS, BLM received 5 protests, all of which applied to Northeastern California and Northwestern Nevada (3 of these applied only to this area, while the other 2 applied to this area and to the rest of the EIS area). The major concerns were that there were changes made in the Final EIS that the public had not been allowed to review in the Draft; that the water quality guidelines were inappropriate; that utilization guidelines should not be imposed throughout the region; that there was no "no grazing" alternative; and that the Bureau does not have enough staff to implement the Standards and Guidelines.

As a result of these protests, BLM has added some language to this ROD to clarify how the standards and guidelines will be implemented. However, no substantive changes have been made to the Northeastern California and Northwestern Nevada Standards and Guidelines from that contained in the Final EIS. Based on the clarification language, three of the protestors subsequently withdrew their protests. The remaining two protests were dismissed by the Director of BLM, who sent letters to the two protestors explaining the reasons for the dismissals.

APPENDIX 1: IMPLEMENTATION

The fallback standards (43 CFR 4180.2(f)(1)) have been in effect in since August 12, 1997. An initial screening of allotments was made, based on existing information, to determine the status of each allotment with respect to meeting the fallback standards. Each allotment was placed into one of four categories as follows:

Category 1: Areas where one or more standards are not being met, or significant progress is not being made toward meeting the standards(s), and livestock grazing is a significant contributor to the problem.

Category 2: Areas where all standards are being met or significant progress is being made toward meeting the standard(s).

Category 3: Areas where the status for one or more standards is not known, or the cause of the failure to not meet the standard(s) is not known.

Category 4: Allotments where one or more of the standards are not being met or significant progress is not being made toward meeting the standards due to causes other than (or in addition to) livestock grazing activities. (Those allotments where current livestock grazing is also a cause for not meeting the standards is included in Category 1 in addition to this category.) The authorized officer should take appropriate action based on regulation or policy; however, these actions not related to livestock grazing are outside the scope of this implementation plan and will not be addressed in this document.

An assumption has been made by the BLM field managers that, with few possible exceptions, the implementation needed for the regulatory fallback standards and guidelines will essentially be the same as for any anticipated set of final approved standards and guidelines implemented pursuant to this Record of Decision (ROD). Consequently, the categorization of allotments under the standards in this ROD is likely to be the same as the categorization under the fallback standards and guidelines. Existing allotment assessments and their resulting determinations as to category will be reviewed to ensure that the determination is correct under the standards set in place by this ROD.

New allotment assessments, reviews of existing allotment assessments, and determination of allotment category will be conducted in full consultation, coordination, and cooperation with permittees and other interests.

We intend to conduct rangeland health assessments on all allotments within the next 5 years. First priority for these assessments will be given to those allotments where we already know or suspect one or more of the standards are not being met. These include those allotments placed in Category 1 under the fallback standards and those allotments currently in Category 3 that we have reason to believe may not be meeting standards. After these allotments have been assessed, the remaining allotments will be assessed using the BLM I, M, and C priority management system, with first priority to I, second to M, and last to C.

For those allotments where the standards are not being met (Category 1), management actions will be implemented to correct the situation prior to the next grazing season turn-out period for the allotment. The management options will be determined in full coordination, consultation, and cooperation with permittees and other interests.

Monitoring will be conducted to evaluate the progress towards improving rangeland health and to evaluate the success of the specific management measures applied (see Guideline 17).

APPLICATION OF GUIDELINES

Once the guidelines are approved by the Secretary of the Interior, they will be applicable to the management of livestock grazing on all allotments not meeting the health standards. Some guidelines will be applicable regardless of the specific rangeland health condition, as they are designed to help protect and sustain rangeland health and are not intended to be applied only to remedy problems. Many of the guidelines will need to be more specifically identified and then applied as terms and conditions of a permit or lease, based upon the specific needs for meeting rangeland health standards. There will be instances where specific terms and conditions will be applied to grazing use authorizations for reasons other than those directly related to rangeland health, such as to accommodate other resource needs and land uses or to meet administrative requirements. Examples of this may include protecting cultural resource sites, requiring a specific breed of livestock to be used that is compatible with the needs of other permittees or lessees using the same allotment, or for meeting various regulatory requirements for grazing administration purposes. In some instances, existing terms and conditions will be carried over from previously made plans and commitments, such as those identified in allotment management plans or coordinated management plans. In these instances, the terms and conditions may or may not be related to rangeland health needs.

Any terms or conditions specified for a permit or lease must be consistent with and support appropriate BLM land use plans or other land use plans applicable to the public lands. BLM will also adhere to requirements such as those identified as terms or conditions from a biological opinion for protecting the habitat of a plant or animal under the Endangered Species Act.

Terms and conditions will be applied to grazing permits, leases, or other grazing authorizations as the authorized officer (Field Manager) determines the need. The determination of what terms and conditions will be applied will be made in full consultation, coordination, and cooperation with the respective permittees/lessees and other interested parties involved in the particular allotment. The same process will be used for making needed changes to any existing terms and conditions. Information from assessments and evaluations of monitoring data will be used to determine the management changes needed. Management options that would be expected to move allotments toward meeting the standards will be determined in full coordination, consultation, and cooperation with permittees/lessees and other interested parties.

Alternative management changes will be considered and evaluated through the NEPA process prior to making final determinations. It is anticipated that in most instances, the terms and conditions will be identified cooperatively and be agreed upon by the affected permittee/lessee and all interested parties. Where an agreement cannot be reached, then a formal decision (which is appealable) will be issued.

If reductions in permitted use are necessary to achieve the standards or meet the guidelines, the animal unit months (AUMs) by which the permitted use is reduced will be held in suspension. Once the authorized officer determines that rangeland health has recovered to an extent that all or part of the suspended permitted use can be restored, this suspended permitted use shall first be apportioned in satisfaction of suspended permitted use to the permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available (this is in accordance with 43 CFR 4110.3-1(b)).

REPORTING PROGRESS IN RANGELAND HEALTH ACHIEVEMENTS

Rangeland health conditions will be reported annually for each grazing allotment. This information will include the determinations of rangeland health conditions through assessments and monitoring and the progress made towards meeting rangeland health standards. At a minimum the report will identify, by allotment: (1) what standards, if any, are not being met; (2) whether significant progress is being made toward meeting those standards that are not currently being met; (3) the magnitude of those standards not being met, in terms such as acres, miles of stream, number of sites, etc.; (4) the progress that has been made in determining and implementing needed management changes; and (5) the results of making the management changes as determined from monitoring and assessment information. Additionally, any changes in the management categories of the allotments will be identified, accompanied by an explanation of the reasons for the change.

The above information will be gathered at the field office which administers the respective allotment(s). A summary of this information will be consolidated for all of the allotments within the EIS area and made available to the public annually.

Tables were provided in the Final EIS that showed all allotments in the State and the category to which they were assigned in 1997. Since that list was compiled, management changes have been implemented and additional assessment and monitoring work has been completed that makes those lists obsolete. When the annual report is compiled each year, an updated list of all allotments, by category, will be provided as part of the report.

Throughout all processes the public is encouraged to participate in the identification of rangeland health conditions, developing management remedies, monitoring results, and reviewing progress towards achieving rangeland health standards.

APPENDIX 2: ASSESSMENT AND MONITORING

Assessment to Determine if Allotments are Meeting Standards

“Assessment” means the analysis, synthesis, and interpretation of information, including monitoring data, to characterize the health of an allotment or other management unit. Gathering new information in the field may be necessary as part of the assessment process. “Monitoring” means the periodic gathering of information.

In some cases, quantitative monitoring data, gathered over a period of years, may be essential to determine whether an area meets the standards and whether livestock grazing is a significant factor contributing to a failure to meet the standards. However, quantitative monitoring data is not always required to make these determinations nor to implement actions to improve grazing management. The preamble to the 1995 grazing regulations (BLM 1995) states that managers may “use a variety of information, including monitoring records, assessments, and knowledge of the locale.” The 1995 regulations also require the manager to “reduce permitted grazing use or otherwise modify management practices...when monitoring or field observations show grazing use or patterns of use are not consistent with the provisions of 43 CFR subpart 4180" (43 CFR 4110.3-2(b); subpart 4180 includes the standards and guidelines). Changes in permitted use are to be “...supported by monitoring, field observation, ecological site inventory, or other data acceptable to the authorized officer.” Therefore, actions needed to improve grazing management in order to comply with guidelines or meet standards should not be delayed solely because monitoring data are lacking. Rangelands will not be allowed to deteriorate while prolonged monitoring studies are conducted, when reliable indicators of rangeland health demonstrate a need for corrective action.

Assessments should employ the minimum information needed to determine whether the standards are being met and whether livestock grazing is a significant factor in failing to meet the standards. All resource information or data collected should be tied directly to the standards, guidelines, or resource objectives.

Field Offices will conduct assessments of all allotments according to the priority described in Appendix

1. These assessments will be done using an interdisciplinary approach, and the findings and reasons for the findings will be documented. The format and content of this documentation will be left up to individual Field Managers, but the form used by the Eagle Lake Field Office (Appendix 24 in the Final EIS) is one example of the type of documentation that could be employed.

The term "assessment," when used by itself, has the meaning described above; that is, it considers all available information, whether from inventory, monitoring, or qualitative assessments. "Qualitative assessment" refers to a particular method used to rapidly assess whether allotments or areas within allotments are meeting standards. The Proper Functioning Condition (PFC) procedure is the qualitative assessment method that is applied to riparian/wetland areas (BLM 1993b and 1994). The Qualitative Procedure to Assess Rangeland Health (Appendix 25 in the Final EIS) is the qualitative method that will be applied to upland rangelands. The use of these procedures, and their relationship to monitoring, will be discussed in more detail below.

Application of Traditional Rangeland Monitoring to Assessing Whether Standards are Being Met

Many rangeland monitoring studies have been in place and read on a regular basis by BLM personnel in California for many years. These studies involve using qualitative or quantitative procedures, or both, and often are directed at determining the condition and trend of key species in key areas. The basic types of studies, as well as the use of the key species and key area approach, are described in Chapter 3, Section 3.2.5, of the Final EIS. The purpose of these studies has primarily been to determine if management objectives relative to particular grazing allotments are being met or if the trend is toward meeting these objectives. For example, a management objective might be to increase the frequency of a key species such as squirreltail (*Elymus elymoides* ssp. *elymoides*) by 10% in Pasture A of Allotment Z in 5 years. Some method of frequency monitoring is then set up in one or more key areas in Pasture A and read on a regular basis (this could be annually but might be once every five years; in this example the frequency of monitoring would have to be at least every five years). In another example, the objective might be to increase the basal cover of the key species bluebunch wheatgrass (*Pseudoregneria spicata* ssp. *spicata*) in Pasture B of Allotment X by 5 percent over the next 6 years. A method of monitoring that measures cover is then set up in one or more key areas of Pasture B and read on a regular basis (this could be annually or on some other schedule, but must be at least every 6 years).

Management objectives have not always been directed at key species. Objectives to increase the total vegetation cover on particular pastures or allotments have also been applied, as well as objectives to decrease the cover of shrubs or trees. In both of these examples, monitoring methods are chosen that measure or estimate cover. These methods might be quantitative in nature or qualitative; the latter might involve taking photographs, either on the ground or aerially.

A second monitoring objective of traditional rangeland monitoring has been to determine the "condition and trend" of rangelands. The condition is determined by comparing the current species composition and production of a given ecological site to the species composition and production of the potential natural community of that site (see Chapter 3, Section 3.3.3 in the Final EIS for a more complete description of the process). Trend is recorded as upward, downward, or static, based on whether species composition and production are moving toward, away, or not at all, respectively, from the potential natural community. Ecological site inventory (ESI) is used to determine condition at any one point in time. A second ESI can then be used to determine trend; other monitoring studies, however, can also be used for this purpose, if they yield information on species composition.

Although much of the monitoring currently is being conducted will have applicability to determining the effectiveness of implementation of the rangeland standards, some old methods will have to be modified and new methods introduced. This is because the standards require monitoring of certain rangeland attributes that are not assessed under current methodology.

Table 1 is a list of rangeland attributes that may be assessed in order to determine whether standards are being met.

Table 1. List of rangeland attributes that may be assessed in order to determine whether standards are being met, along with the actual wording of the indicator(s) to which each attribute applies (parentheses following each indicator show the standard to which it applies). Several indicators apply to more than one attribute and therefore are listed under each of the appropriate attributes.
1. Ground cover a. "Gravel bars and other coarse textured stream deposits are successfully colonized and stabilized by woody riparian species" (Streams) b. "Stream bank vegetation is vigorous and diverse, mostly perennial, and holds and protects banks during high stream flow events" (Streams) c. "Ground cover (vegetation, litter, and other types of ground cover such as rock fragments) is sufficient to protect sites from accelerated erosion" (Soils) 2. Litter/residual dry matter "Adequate organic matter (litter and standing dead plant material) is present for site protection and decomposition to replenish soil nutrients and maintain soil health" (Biodiversity) 3. Plant species diversity a. "Vegetation is vigorous, diverse in species composition and age class, and reflects the potential natural vegetation or desired plant community for the site" (Upland Soils) b. "Stream bank vegetation is vigorous and diverse, mostly perennial, and holds and protects banks during high stream flow events" (Streams) c. "Riparian vegetation is vigorous and mostly perennial, diverse in species composition, age class and life form sufficient to stabilize stream banks and shorelines." (Riparian and Wetland) d. "Riparian vegetation and large woody debris are well anchored and capable of withstanding high stream flow events" (Riparian and Wetland) e. "Habitat areas are sufficient to support diverse, viable, and desired populations and are connected adequately with other similar habitat areas" (Biodiversity) 4. Plant vigor a. "Vegetation is vigorous, diverse in species composition and age class, and reflects the potential natural vegetation or desired plant community for the site" (Upland Soils) b. "Stream bank vegetation is vigorous and diverse, mostly perennial, and holds and protects banks during high stream flow events" (Streams) c. "Riparian vegetation is vigorous and mostly perennial, diverse in species composition, age class and life form sufficient to stabilize stream banks and shorelines." (Riparian and Wetland) d. "Vigor is adequate to maintain desirable levels of plant and animal species to ensure reproduction and recruitment of plants and animals when favorable events occur." (Biodiversity)

5. Plant structure
   a) "Vegetation is vigorous, diverse in species composition and age class, and reflects the potential natural vegetation or desired plant community for the site" (Upland Soils)
   b) Gravel bars and other coarse textured stream deposits are successfully colonized and stabilized by woody riparian species" (Streams)
   c) "Riparian vegetation is vigorous and mostly perennial, diverse in species composition, age class and life form sufficient to stabilize stream banks and shorelines." (Riparian and Wetland)
   d) "Age class and structure of woody riparian and wetland vegetation are appropriate for the site" (Riparian and Wetland)
   e) "A variety of age classes are present for most species" (Biodiversity)
   f) "Wildlife habitats include seral stages, vegetation structure, and patch size to promote diverse and viable wildlife populations" (Biodiversity)

6. Spatial distribution of plants and their habitats
   a) "Distribution of plant species and their habitats allow for reproduction and recovery from localized catastrophic events" (Biodiversity)
   b) "Wildlife habitats include seral stages, vegetation structure, and patch size to promote diverse and viable wildlife populations" (Biodiversity)
   c) "Habitat areas are sufficient to support diverse, viable, and desired populations and are connected adequately with other similar habitat areas" (Biodiversity)
   d) Natural disturbances "Natural disturbances such as fire are evident, but not catastrophic" (Biodiversity)
   e) Non-native plants and animals, including noxious and invasive species "Non-native plant and animal species are present at acceptable levels" (Biodiversity)
   f) Special status species
   g) "Habitat areas are sufficient to support viable populations and are connected adequately with other similar habitat areas" (Biodiversity)
   h) "Healthy, productive and diverse populations of native plant and animal species, including special status species, are maintained" (Biodiversity)

7. Tree and shrub canopy cover "The stream water surface has a high degree of shading, resulting in cooler water in summer and reduced icing in winter" (Streams)
   a) Woody debris "Riparian vegetation and large woody debris are well anchored and capable of withstanding high stream flow events" (Riparian and Wetland)

8. Streambank stability
   a) "Stream bank vegetation is vigorous and diverse, mostly perennial, and holds and protects banks during high stream flow events" (Streams)
   b) "Riparian vegetation is vigorous and mostly perennial, diverse in species composition, age class and life form sufficient to stabilize stream banks and shorelines." (Riparian and Wetland)

9. Chemical constituents of water "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)
   a) Water temperature
   b) "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)

c) "The stream water surface has a high degree of shading, resulting in cooler water in summer and reduced icing in winter" (Streams)

10. Nutrient loading "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)

11. Fecal coliform "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)
    a) Turbidity "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)

12. Suspended sediment "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)

13. Dissolved oxygen "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)

14. Aquatic and riparian organisms "The following do not exceed the applicable requirements for physical, chemical, and biological constituents including, but not limited to: temperature, nutrients, fecal coliform, turbidity, sediment, dissolved oxygen, aquatic organisms and plants (e.g., macroinvertebrates, fish, algae, and plants)" (Water Quality)

15. Soil erosion
    a) "Evidence of wind and water erosion, such as rills and gullies, pedestaling, scour or sheet erosion, deposition of dunes is either absent or if present does not exceed what is natural for the site" (Upland Soils)
    b) "Negligible accelerated erosion as a result of human activities is present" (Riparian and Wetland)

16. Degree of floodplain flooding "Portions of the primary floodplain are frequently flooded (inundated every 1-5 years)" (Streams)

Monitoring of Vegetation and Physical Attributes

Vegetation monitoring (including soil crusts). Table A.22.2 in the Final EIS lists the trend monitoring methods currently in use or described in the Interagency Technical Reference, Sampling Vegetation Attributes (BLM et al. 1996a) and the plant and vegetation attributes they measure. Of the attributes listed in Table 1 in this appendix, the following can be monitored using a combination of the methods from the technical reference:

- Ground cover
- Litter/residual dry matter

- Plant species diversity
- Plant vigor
- Soil crusts
- Plant structure
- Spatial distribution of plants and their habitats
- Natural disturbances (although not specifically identified by a column heading on Table A.22.2, these can be tracked under the heading "spatial distribution")
- Non-native plants (these can be monitored by measuring or estimating density, frequency, or cover)
- Special status plants (these can be monitored by measuring or estimating density, frequency, or cover)
- Tree and shrub canopy cover

Note, however, that in some cases these attributes are not measured or estimated as part of the standard procedure. For example, the typical way in which the Daubenmire method (which estimates canopy cover in either 6 or 10 categories in a series of plots) is used yields measurements of the cover of bare ground, vegetation, litter, gravel/rock, as well as frequency and species composition. Other attributes, such as the cover of biological, physical, and chemical crusts, cryptogams, production, and vigor *can* be incorporated into the standard procedure with proper planning.

Monitoring of Guidelines Associated with Utilization, Residue, and Stubble Heights.

For the reasons given in Section 3.2.5 in the Final EIS, it is important to set and monitor guidelines on utilization levels, minimum residues, and minimum stubble heights. Guidelines have been set for the entire EIS area where standards are not being met; site-specific guidelines may be set by Field Offices. Existing monitoring of utilization, residue, and stubble heights will continue, and new studies will be established as needed. On upland perennial rangelands not meeting the standards, utilization will be measured on key species in key areas, with the average (mean) utilization used to assess whether the portion of the allotment or pasture represented by the key area is meeting the utilization guideline (there are indications that the median may be a better statistic to use than the mean; we will calculate both statistics from the same data sets and make this determination after examining the data over a period of a few years). We recognize that residue, in terms of stubble height and litter, is a better measure of utilization in upland perennial grass communities than percent utilization, but we do not have sufficient information at this time to develop guidelines that use these attributes. We intend to investigate this matter further, however, as time and funding permit, and to eventually replace the utilization guidelines on perennial uplands (which specify percent of key species removed) with guidelines specifying minimum amounts of residue to be left. A very preliminary study proposal is given in Table 2.

Table 2. Preliminary Study Proposal: Developing Residue and Stubble Height Guidelines for Major Vegetation Types in the Great Basin

Objective:	Develop upland residue and stubble height guidelines for the major vegetation types in the Great Basin Conduct a literature review. This review would look at material published in peer-reviewed publications and "gray" literature as well as information collected by field offices. In addition, range scientists at universities and in other agencies (e.g., NRCS, ARS, Forest Service) would be interviewed.

Conduct the following study.

A study would be conducted to fill in the gaps in information that are expected to exist following the literature review. Over a period of several years the residue left following known levels of utilization will be measured at several sites in different vegetation types. This will entail measuring total above ground production in ungrazed areas (using either cages or exclosures), measuring utilization after the grazing season on key species, and measuring the amount of standing and fallen dead plant material (separately) at that level of use. The stubble heights of key species will also be measured both in grazed and ungrazed condition. Photographs will be taken both of the key species and the landscape, both in grazed and ungrazed areas. As much as possible, sites should be selected that are close to existing weather stations (NOAA, RAWS stations, etc.) so the total production can be related to the amount of precipitation received.

The study should be conducted over several years in order to show a range of residue, stubble heights, and utilization levels as related to different amounts of precipitation. This study should enable field personnel to develop either State or regional guidelines on the appropriate residue and stubble height levels that should be left following grazing.

Following is a list of the utilization and residue studies from the Interagency Technical Reference, *Utilization Studies and Residual Measurements* (BLM et al. 1996b) that may be applied to public lands within the EIS area:

Browse Utilization Methods:
- Twig Length Measurement Method
- Cole Browse Method
- Extensive Browse Method

Residue Measuring Methods
- Stubble Height Method
- Visual Obstruction Method
- Comparative Yield Method

Herbaceous Utilization Methods
- Paired Plot Method
- Ocular Estimate
- Key Species Method
- Height-Weight Method
- Actual Weight Method
- Grazed-Class Method
- Landscape Appearance Method

Exact methods to be used to monitor utilization, residue, and stubble heights will be determined by the Field Offices.

The above utilization and residue monitoring studies are usually applied to key areas (see the glossary in the Final EIS for a definition of key area and the discussion of key areas in Chapter 3, Section 3.2.5 of the Final EIS). Utilization pattern mapping is another important monitoring tool. This method entails canvassing the entire allotment or individual pasture and mapping the area into several classes based on the level of utilization (e.g., no use, light use, moderate use, and heavy use) on key species (see Chapter 3, Section 3.2.5 for more information). These studies will continue where necessary.

Actual use monitoring. Actual use studies (BLM 1984) are another form of traditional range monitoring that will continue. These studies track the actual use made by livestock in pastures and/or allotments based on the numbers of livestock and the length of time livestock are present. These numbers are usually provided by lessees/permittees but are sometimes also estimated from counts by BLM professionals. The actual use made by other herbivores such as wild horses and burros and wildlife is often estimated as well. These data are important in determining what changes should be made when objectives and standards are not being met.

Climate monitoring. It is important to consider climate when interpreting monitoring data. Climate monitoring most often consists of compiling precipitation and temperature information collected by the National Oceanic and Atmospheric Administration at the many weather stations in the EIS area. In some cases, precipitation data are collected through the placement of rain gauges in allotments. Additionally, both temperature and precipitation data are collected from 14 Remote Automated Weather Stations (RAWS) within the EIS area.

Riparian-wetland monitoring. The vegetation attributes of riparian-wetland areas are monitored using one or more of the techniques described in Table A.22.2 in the Final EIS. The Greenline Riparian-Wetland Monitoring Method (BLM 1993a) is also used by some field offices. The following physical attributes are also monitored on some riparian-wetland areas:

Bankfull discharge
Sinuosity
Riparian zone width
Floodplain and channel characteristics (i.e., rocks, overflow channels, coarse and/or large woody debris)
Width/depth ratio

Use of Qualitative Assessments to Determine if Standards are Being Met

As noted above, traditional range monitoring studies can help assess whether standards are being met. The standards, however, call for the assessment of indicators that are not addressed by these traditional monitoring studies. Where the status of these indicators cannot be inferred from existing monitoring information, other monitoring or assessment methods must be employed. The following qualitative assessment procedures were developed to rapidly assess all the physical and biological components of rangeland health.

Qualitative Upland Assessment. For uplands, the qualitative assessment method will be used. Although a technical reference has not yet been finalized on the method, a draft has been prepared and field tested. The details were given in Appendix 25 in the Final EIS. Field Offices may adapt this method as necessary to meet local needs. The results of the qualitative assessment will be used in conjunction with all other available information to determine if an allotment is meeting the standards. If it is not, and does not appear to be making significant progress toward meeting the standards, and grazing has been determined to be a significant factor, changes will be made to the management of livestock grazing. To assess whether these management changes are effective in moving toward meeting the standards, monitoring will be initiated (or, if already being conducted, will be continued) that is directed toward those indicators that caused the allotment to not meet the standards. For example, if the qualitative assessment indicates that insufficient litter is present, subsequent monitoring will focus on measuring the amount of litter (either the cover of litter or the amount in weight of litter).

Qualitative Riparian/Wetland Assessment. A qualitative procedure, called proper function condition (PFC) assessment (see Appendix 23 of the Final EIS), is already in place to help assess whether riparian and wetland areas are meeting the standards (BLM 1993b and 1994). This PFC assessment has already been applied to many riparian/wetland areas within the EIS area. Its use will be continued. Just as with the upland qualitative assessment procedure, when the PFC results in one or more indicators being responsible for an allotment not meeting the standards, subsequent monitoring will focus on those indicators. For example, if the width/depth ratio is the main reason a stream is determined to be not meeting the standard of proper functioning condition, subsequent monitoring would focus on the width/depth ratio of the stream.

Wildlife Monitoring for Rangeland Health

The standards for rangeland health include a "biodiversity" standard. They also include several indicators of animal habitats and populations that are attributes of a healthy rangeland ecosystem. These indicators can be divided into those related to habitat and those related to animal populations. The habitat indicators include habitat seral stages, vegetation structure and patch size, spatial distribution of habitats, habitat size, how habitats are connected, and the habitat's ability to support viable populations. The animal population indicators include the spatial distribution of animals, special status species numbers, stable to increasing populations, viable populations, and levels of non-native animals.

The BLM recognizes that determining the biodiversity health for each allotment is an impossible task involving the gathering of species-specific data at many locations and scales. However, a more achievable option is to design monitoring programs that evaluate ecosystem components, structures and processes as indicators of a habitat's *capability* to support healthy animal communities. We would then rely on focused studies to more directly monitor species of management concern.

There are different scales of monitoring and management to evaluate the relationships between habitat management from livestock grazing and animal populations. It is critical to evaluate the assumptions that habitat management at the allotment (or pasture) level will actually affect animal presence and abundance at the monitoring site(s). It is necessary to determine the appropriate scale of monitoring: coarse scale regional monitoring of several allotments for some animal community indicators; fine scale monitoring at the allotment level for some special status, game animals, and keystone species; and site-specific scale for some special status species and ecosystem health indicators that are restricted to very small habitat areas. Monitoring plans should consider these issues of scale when designing allotment monitoring programs.

Habitat mapping and vegetation monitoring would usually suffice to evaluate whether the allotments are providing *adequate opportunities* for wildlife communities in meeting the standards. Spot checking for selected species at the appropriate habitats over several allotments would evaluate rangeland health for many species. At a finer scale of analysis, population censuses at the allotment scale may be needed to determine if the standards are being met. This finer scale monitoring would be directed at special status animals or at species with a very restricted habitat requirement as a rangeland health indicator.

Most allotment monitoring will evaluate the habitat capability for species of management concern. Vegetation characteristics of habitat structure (for example, ground cover, vertical layering, form of trees and shrubs), plant composition, age structure of plants (young, reproducing, old, or decadent trees or shrubs), plant vigor, and the distribution of plant communities across the landscape will be the focus of BLM's monitoring.

Field assessments should emphasize the use of habitat quality checklists to identify significant problems at the appropriate scale (allotment or landscape levels). These checklists can be designed to evaluate habitat quality for a particular species, group of species, or general animal community composition. The elements of such a checklist are given in Table 3. More focused studies or monitoring protocols may be developed where habitat monitoring indicates standards are not being met and where management priority is high.

The BLM will consider existing information on soils, habitats, scientific literature, historic records, fire history, and disturbance regimes to assess habitat capability. When more detailed information regarding a particular species is required, wildlife information systems and species records may be used to conduct assessments of habitat quality for animals of management concern. The California Wildlife Habitat Relationships System (CWHR) and Habitat Evaluation Procedures (HEP) models may be used for these assessments. These models are based on the assumptions that through habitat assessments, habitat capability (quality) for a particular species or group of species can be determined. The California Natural Diversity Data Base will be used to help assess the significance of BLM actions on special status animal species and rare plant communities.

The rangeland health indicators for animal (wildlife) populations cannot be assessed separately for each species. Evaluating animal numbers and distributions for each species would require an extensive amount of monitoring of hundreds of animal species, a task far beyond the capability of the BLM and our State and private management partners. Instead, monitoring must be focused on a subset of animal "indicator" species that represent wildlife communities and populations in general as indicators of ecosystem health. While this method of monitoring has been criticized as flawed since each species has its own niche in the ecosystem that cannot be represented by another species, this approach gives the BLM the opportunity to focus wildlife monitoring within our capability. The indicator species may be threatened or endangered, game animals, species of regional or special concern, keystone species, abundant, or rare. The selection of the indicator species will depend on the allotment management objectives, land use plan objectives, and/or BLM commitments to regional plans. The monitoring of the indicator species may include general distribution or abundance surveys or more focused research to better evaluate the relationships between the animals and their habitats and grazing effects. In many cases, data collection may not be required within each allotment, but across the landscape in habitats with similar characteristics.

Table 3. Elements of a Biodiversity and Species Checklist for Wildlife.

Habitats

CWHR Habitats and seral stage (es) present:

Habitat composition and seral stages related to management objectives:

- Seral stages meet management objectives
- Plant community composition indicates good rangeland health
- Native species present at acceptable levels
- Non-native species at acceptable levels
- Invasive weeds at acceptable levels

Habitat structure related to management objectives:

- Plant cover is adequate, within natural range
- Plant height adequate: herbaceous shrub trees
- Plant density is adequate
- Plants distributed normally
- Ground cover is within normal range

Age-class indicates community maintenance
Form-class indicates normal growth characteristics

Distribution of Habitats across landscape:
Patch size is adequate
Fragmentation is not excessive
Habitats are connected within site capability

Species

Management indicators selected:
Habitats meet requirements of indicator species:
Elements are considered acceptable:
Elements lacking:

Key management areas present:
Listed species habitats
Riparian
Wetlands
Seasonal ranges (winter, migratory, calving/fawning, etc)
Breeding/nesting sites

Focused Studies

Focused studies in progress:
Focused studies needed:

Evaluation:

Habitats are meeting management objectives Habitats promote diverse and viable wildlife populations Seral stages present Composition

Structure Distribution Habitats can withstand catastrophic events (flood/fire/windstorm) Species present indicate healthy ecosystem function Habitats meeting species/diversity standards Habitats <u>not</u> meeting species/diversity standards Livestock grazing/management is (is not) significant factor Management changes needed to meet standards

Water Quality Assessment and Monitoring

Most often, when riparian areas and wetlands are healthy, the quality of water for most beneficial uses meets standards. Many of the attributes assessed and monitored for riparian and wetland areas also affect the quality of the water, at least indirectly. There are exceptions, however, where this may not always be true, particularly with regard to the chemistry and physical properties of the water. Biological assessments and monitoring of aquatic organisms in water bodies serve to identify important attributes reflecting the quality of water for many beneficial uses and will be used when it is determined that the quality of the water may be in question.

In most situations BLM will depend upon the State and Regional water quality agencies to either identify, or assist BLM in identifying, where water quality is impaired or has a high probability of being impaired. For those areas where livestock grazing activities on public land are known to cause or are suspected of causing water quality impairment, BLM will closely coordinate with these agencies in obtaining any needed water quality monitoring and assessment information. Where sufficient information is not available, BLM will also closely coordinate with these agencies in the selection and design of the attributes to be assessed and monitored by BLM. Since the states have primary responsibility and primacy regarding the Clean Water Act and the Safe Drinking Water Act, it is important that any water quality assessment or monitoring information obtained by BLM meet the acceptance of those state agencies responsible for identifying the specific requirements of those Acts.

Effectiveness Monitoring of Guidelines

Effectiveness monitoring is used to evaluate whether a particular activity, when carried out as planned, results in the desired effect (MacDonald et al. 1991). In the context of rangeland standards and guidelines, effectiveness monitoring will be used to evaluate whether guidelines, if followed, result in either meeting or making progress toward meeting the standards. This type of monitoring will be employed when the other types of monitoring and assessment discussed in this appendix determine that progress is not being made toward meeting standards despite compliance with guidelines. For example, a grazing system is implemented in order to move an allotment toward meeting standards, but after five years of monitoring no progress is detected. The management system will then be evaluated to determine why it is not producing the desired effects and changed accordingly. Utilization and stubble height guidelines provide another example. If, after several years of compliance with these guidelines, allotments are not moving toward meeting standards, these guidelines will be evaluated and supplanted by new ones as appropriate.

Application of New Technology to Monitor and Assess Rangeland Health

Traditional transect-based techniques for measuring vegetation and other indicators of rangeland health provide detailed information at a plot level. Care must be used when using plot-based measurements to characterize large areas because of problems in extrapolating information from small samples to large areas. Methods for assessing rangeland health at multiple scales are currently in their infancy. The use of remotely-sensed data, primarily satellite imagery, will hopefully become a rapid and inexpensive method for measuring rangeland health on larger areas.

One pilot effort recently initiated in the northeastern portion of the EIS area is a cooperative project between BLM, the Natural Resource Conservation Service, and the Forest Service's Pacific Northwest Experiment Station. It involves the transitioning from traditional Soil Surveys to Resource Surveys, which are multi-resource, map-based surveys of soil, vegetation, water, and wildlife characteristics. Part of the project will include development of a set of tools that will be designed to assess rangeland health at multiple scales and areal extent.

As new methodologies such as this one are developed, they will be applied to monitoring and assessing rangeland health standards within the EIS area.

Monitoring and Assessment Plans

Each Field Office will develop a plan that will direct its monitoring and assessment activities relative to making determinations on whether standards are being met, whether progress is being made toward meeting the standards if they are not currently being met, and whether livestock grazing is the reason for standards not being met. These plans need not be elaborate, but at a minimum they will include a list of the attributes that will be monitored, the monitoring methods that will be used (with reference to a complete description of the method), the allotments that will be monitored using these methods, the frequency at which the allotments will be monitored, and how often interdisciplinary assessments will be made of all the information collected (including monitoring data, qualitative assessment information, inventory data, etc.). A monitoring and assessment schedule will also be included. These monitoring and assessment plans will be made available to all interested parties.

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Appendix C

Northeast California Resource Advisory Council Recommended Off-Highway Vehicle Management Guidelines

Bureau of Land Management

Northeast California Resource Advisory Council
Recommended Off-Highway-Vehicle Management Guidelines

Adopted and Forwarded to the Bureau of Land Management
at a Regularly Scheduled Business Meeting
August 29, 2000
Susanville, California

The guidelines for Off-Highway-Vehicle management are the methods and practices determined to be appropriate to ensure that BLM Land Health Standards can be met, or that significant progress can be made toward meeting the standards. The guidelines were designated to provide direction, yet offer flexibility, for implementation through OHV designations, activity plans and permit terms and conditions.

Guideline 1: OHV use will not be allowed on streams, riparian/wetland areas. Where needed, crossings will be bridged or hardened.

Guideline 2: OHV use will not degrade ecological status.

Guideline 3: OHV use requires review/action during/after periods of high use and or stress (fire, flood, drought). OHV closure may be appropriate in response to factors such as accelerated erosion or loss of natural barriers to off-road use.

Guideline 4: Plans for OHV use must consider other resources and uses (livestock grazing, recreation, archaeological sites, wildlife, horses and burros, mineral resources extraction, etc.) and be coordinated with other users of public lands. Management of OHV Use should be sensitive to the creation and management of areas for quiet activities.

Guideline 5: OHV use will be managed to provide for the maintenance and reproduction of desired plant species and the achievement of the potential natural vegetation or desired plant communities.

Guideline 6: OHV special events will require permits that will include site specific, measurable terms and conditions.

Guideline 7: OHV projects that are subject to California OHV grant funding shall comply with that program's requirements as well as Land Health Standards. Tread Lightly concepts and non-proliferation principles will be included in permits.

Guideline 8: OHV use must consider habitat requirements for fish and wildlife

Guideline 9: OHV management practices must consider soil erodiblity. Route designation and OHV management will be based on erosion hazard ratings.
Guideline 10: The spread of noxious weeds by OHV use will be combated through public education efforts, and vehicle cleaning requirements, or other measures, where appropriate.

Guideline 11: Locate routes, trails and developments away from sensitive areas.

Guideline 12: OHV related activities will be managed to protect and maintain watershed and water quality.

Guideline 13: Use various communication and interpretive measures and user groups to inform public land visitors about an ethic of public land use.

Guideline 14: OHV utilization and impacts will be monitored using currently accepted practices and techniques.

Guideline 15: “Open” OHV use areas must be specifically designated.

Appendix D

Energy and Minerals

Reasonably Foreseeable Development in the Surprise Field Office

Introduction

This appendix describes scenarios for the reasonably foreseeable development of leasable, locatable, and saleable mineral commodities. The scenario for reasonably foreseeable development estimates the level and type of future mineral activity in the planning area and provides a basis for the analysis of cumulative effects. The scenario first describes the steps in developing a mineral deposit, with presentation of hypothetical exploration and mining operations. Current levels of activity are discussed in Chapter 3. Trends and assumptions affecting mineral activity are discussed in this appendix, followed by estimates for future mineral exploration and development.

Scope

The scenario for reasonably foreseeable development is based on known or inferred mineral resource capabilities and applies the conditions and assumptions discussed below. Changes in available geologic data or economic conditions would alter reasonably foreseeable development, and some deviation should be expected over time. The development scenario is limited to BLM-administered land.

Leasable Mineral Resources

Reasonably Foreseeable Development of Oil and Gas

Future trends and assumptions: Based on the history of minimal interest for oil and gas exploration and the limited development potential of the planning area, activity over the next 15 to 20 years is likely to be sporadic. Oil and gas activity will probably consist of the issuance of some competitive and over-the-counter leases, a few geophysical surveys, and perhaps the drilling of two or three exploratory wells.

Geophysical exploration: Geophysical exploration is conducted to determine the subsurface structure of an area and the potential for mineral resources. Three geophysical survey techniques are generally used to define subsurface characteristics through measurements of the gravitational field, magnetic field, and seismic reflections.

Gravity and magnetic field surveys—involve small, portable measuring units that are easily transported by light off-highway vehicles, such as 4-wheel drive pickup trucks and jeeps, or aircraft. Both off and on-highway travel may be necessary. Although these two survey methods can take measurements along defined lines, it is more common to have a grid of distinct measurement stations. Surface disturbance resulting from these surveys is negligible, consisting almost exclusively of soil or vegetation compaction that persists no more than a few months.

Seismic reflection surveys—are the most common of the geophysical methods, and they produce the most detailed subsurface information. Seismic surveys are conducted by sending shock waves, generated by a small explosion or by mechanically beating the ground with a thumping or vibrating platform. In the mechanical technique, four large trucks are usually used, each equipped with pads about 4-feet square. The pads are lowered to the ground, and the vibrations are electronically triggered from the recording truck. Once information is recorded, the trucks move forward a short distance and the process is repeated. Surface disturbance includes flattening of vegetation and compaction of soils.

The explosive method —requires that small charges be detonated on the surface or in a shallow drill hole. Holes for the charges are drilled using truck-mounted or portable air drills. In general, this method uses 4 to 12 holes per mile of line, and a 5 to 50-pound explosive charge is placed in each hole, covered, and detonated. The shock wave created is recorded by geophones placed in a line on the surface. In rugged terrain, a portable drill carried by helicopter can sometimes be used. The vehicles used for a drilling program may include heavy truck-mounted drill rigs, track-mounted drill rigs, water trucks, a computer recording truck, and a light pickup.

Existing roads and trails are used where possible, but off-road travel is necessary in some cases. Several trips per day are made along a seismograph line, usually resulting in a well defined two-track trail. The surface charge method uses 1 to 5-pound charges attached to wooden laths 3 to 8 feet above the ground. Placing charges lower than 6 feet usually results in destruction of vegetation, whereas placing the charges higher, or on the surface of deep snow, results in little visible surface disturbance.

It is expected that three to five notices of intent, involving seismic reflection and gravity/magnetic field surveys, would be filed under all Alternatives and the Proposed RMP during the life of this plan. The total expected surface disturbance would be approximately 1 acre.

Drilling phase: After an application to drill is approved, the operator may begin construction in accordance with lease stipulations and conditions of approval of the drilling permit. When a site requires construction of an access road, the shortest feasible route is usually selected to reduce the haul distance and construction costs. Environmental factors or a landowner's wishes may dictate a longer route in some cases. Drilling in the planning area is expected to be done using existing roads and construction of only short (approximately 0.5 mile) roads to access drill site locations.

Based on the history of oil and gas exploration in the planning area, it is projected that two or three exploratory wildcat wells would be drilled on BLM-administered land in the planning area during the life of this plan. The estimated success rate would be no greater than 10 percent, based on the average wildcat success rate. Drilling is expected to occur in areas of low oil and gas potential, the highest level of potential in the planning area. There is a low probability that a field will be discovered during the life of this plan, with a strong likelihood that the discovery would be natural gas because most of the occurrences, in surrounding areas, are gas. There are no known occurrences in the actual planning area.

During the first phase of drilling, the operator would move construction equipment over existing maintained roads to the point where the access road begins. Less than 0.5 mile of moderate duty access road with a gravel surface 18 or 20 feet wide is expected for construction. With ditches, cuts, and fill, the total width of surface disturbance would average 40 feet. The second part of the drilling phase is the construction of the drill pad (platform). The likely duration of well development, testing, and abandonment is 3 or 4 months per site. The total disturbance for each exploratory well and any new road is estimated to be less than 5 acres. The total surface disturbance caused by exploratory drilling over the life of this plan is expected to be about 13 acres.

Field development and production: Exploratory drilling is not expected to lead to the development of a producing field in the planning area. Nonetheless, the following scenario describes the operations and effects associated with field development. Any oil and gas deposits found in the planning area will probably be too small to be economically developed.

The minimum size considered economically feasible would be a field containing reserves of 50–60 billion cubic feet of gas with a productive life of 10 years. The total area of the field would be 800 acres, with a likely well spacing of 160 acres. The field would require four development wells in addition to the discovery well. Each development well would require 0.25 mile of road. Development well access roads would have a surface of crushed aggregate or gravel and would be approximately 20 feet wide (total disturbed width of 40 feet). Gas produced would be carried by pipelines that could be linked to existing and proposed gas transmission lines in the planning area. Average pipeline length is estimated to be 40–50 miles. The width of the surface disturbance for pipelines would average 30 feet. Any oil produced would be trucked to refineries outside of the local area. Established companies would service the wells.

The total surface disturbance would be 8 acres for well pads, 5 acres for roads, 13 acres for field development; and 725 acres for pipelines (145 acres/well site). The total surface disturbance caused by exploration and development would be 761 acres.

Plugging and abandonment: Wells that are completed as dry holes are plugged according to a plan designed for the condition of each well. Plugging involves placing cement plugs at strategic locations in the hole. Drilling mud is used as a spacer between the plugs to prevent communication between fluid-bearing zones. The drill casing is cut off at least 3 feet below ground level and capped by welding a steel plate on the casing stub. After plugging, all equipment and debris would be removed and the site restored as near as reasonably possible to its original condition. It is projected that one exploratory well that may be drilled would be plugged and abandoned.

Reasonably Foreseeable Development of Geothermal Resources Future trends and assumptions: Because environmental protection and enhancement are major concerns for the BLM, sources of energy with a small environmental impact are becoming increasingly important. The geothermal energy resources known to exist in the region are essentially undeveloped, especially in the planning area. With recent interest in geothermal resources expressed by some governmental and private entities, geothermal exploration may be initiated in the planning area which could possibly lead to development of the resource.

Geophysical/geochemical exploration: As with oil and gas, geophysical/geochemical operations can take place on leased or unleased public land. The operator must comply with all terms and conditions of permits, NEPA, regulations, and other requirements, including reclamation, prescribed by the authorized officer. Monitoring for compliance with these requirements would be done during operations and upon their completion. In addition to geophysical methods discussed in the previous section on oil and gas, the following exploration techniques are often employed in geothermal prospecting:

Microseismic: Small seismometers buried at a shallow depth (hand-dug holes) transmit signals from naturally occurring, extremely minor seismic activity (microearthquakes) to an amplifier on the surface. Stations are located away from roads to avoid the effects of traffic. These units are often backpacked into areas inaccessible to vehicles.

Resistivity: Induced polarization techniques are used to measure the resistance of subsurface rocks to the passage of an electric current. A vehicle-mounted transmitter sends pulses of electric current into the ground through two widely spaced electrodes (usually about 2 miles apart). The behavior of these electrical pulses as they travel through underlying rocks is recorded by small devices that receive the current at different locations. The electrodes are either short rods (2–3 feet long) driven into the ground or aluminum foil shallowly buried over an area of several square feet. Two or three small trucks transport a crew of three to five people to transmitting and receiving sites.

Telluric: A string of receivers record the variations in the natural electric currents in the earth. No transmitter is required. Small trucks are used to transport the crew and equipment.

Radiometric: Radioactive emissions (generally radon gas) associated with geothermal resources are measured using a hand-held scintillometer, often at hot spring locations. Another method involves placing plastic cups containing small detector strips sensitive to alpha radiation either on the surface or in shallow hand-dug holes. If holes are dug, they are covered, and the cups are left in place for 3 to 4 weeks. At the end of the sampling period, the cups are retrieved and all holes are backfilled. These surveys can be conducted by walking to the sites or with the aid of light vehicles.

Geochemical surveys: Geochemical surveys are usually conducted at hot springs by taking water samples directly from the spring. Mercury associated with geothermal resources is often sampled using hand tools. These surveys can be conducted by walking to the sites or with the aid of light vehicles.

Temperature gradient drill hole surveys: Temperature gradient holes are used to determine the rate of change of temperature with respect to depth. Temperature gradient holes usually vary in diameter from about 3.5 to 4.5 inches, and from a few hundred feet to 5,000 feet in depth. They are drilled using rotary or coring methods. Approximately 0.1 to 0.25 acre/drill hole would be disturbed. A typical drill site could contain a drill rig (most likely truck-mounted), water tank(s), fuel tank, supply trailer, and a small trailer for the workers. Drilling mud and fluids would be contained in earthen pits or steel tanks. Water for drilling would be hauled in water trucks, or if suitable water sources are close, could be piped directly to the site. Water consumption could range from about 2,000 to 6,000 gallons/day, with as much as 20,000 gallons/day under extreme lost circulation conditions.

Other equipment that could be used includes large flatbed trucks to haul drill rod, casing, and other drilling supplies; in some cases special cementing and bulk cement trucks; and two small vehicles for transporting workers. In most cases, existing roads would be used. It is likely that short spur trails (usually less than 500 yards) would be bladed for less than 10 percent of these holes. All holes would be plugged and abandoned to protect both surface and subsurface resources, including aquifers, and reclamation of disturbed areas would be required, unless some benefit to the public could be gained (for example, a water well or camping area). Depending upon the location and proposed depth of the drill hole, detailed plans of operation that cover drilling methods, casing and cementing programs, well control, and plugging and abandonment could be required. Based upon past geothermal exploration in California and Nevada and a projected increase in power demand, it is expected that 6 notices of intent for surface geophysical surveys and 5 notices of intent to drill 30 temperature gradient holes would be filed under all Alternatives during the life of this plan. These notices of intent would most likely be filed in the Known Geothermal Resource Area (KGRA). Total surface disturbance resulting from geophysical surveys over the life of the plan is expected to be about 0.5 acre, and disturbance resulting from temperature gradient holes is expected to be about 5.5 acres.

Drilling and testing: Drilling to detect, test, develop, produce, or inject geothermal resources can be done only on land covered by a geothermal lease.

A typical geothermal well drilling operation would require 2–4 acres for a well pad, including reserve pit, and 0.5 mile of moderate duty access road with a surface 18 to 20 feet wide (total disturbed width, with ditches, cuts, and fills, of 40 feet). Existing roads would be used whenever possible. Total surface disturbance for each well and any new road is expected to be less than 6 acres. In some cases, more than one production well could be drilled from one pad. Well spacing would be determined by the authorized officer after considering topography, reservoir characteristics, the optimum number of wells for proposed use, protection of correlative rights, potential for well interference, interference with the multiple uses of the land, and protection of the surface and subsurface environment.

There would be close coordination with the State of Nevada and/or California. The expected duration of well development, testing, and abandonment (if dry) would be 6 months. It is estimated that eight exploratory wells would be drilled under all alternatives and the Proposed RMP during the life of the plan, resulting in a total surface disturbance of 34 acres.

Plugging and abandonment: Before abandonment, the operator would be required to plug the hole to prevent contamination of aquifers and any effects to subsurface and surface resources. Cement plugs would be placed at strategic locations in the hole using the same techniques as for exploratory oil and gas wells. Any new roads not needed for other purposes would be reclaimed.

Geothermal power plant development: It is projected that one power plant generating 25 megawatts of electricity (gross) may be constructed within a Known Geothermal Resource Area under all alternatives during the life of the plan and employing an estimated 30 people. It is expected that the developed geothermal power plant would be water-dominated and that the geothermal power conversion system would either be single or double flash, or binary cycle. Before geothermal development could occur, site specific baseline studies and environmental analyses, with public involvement, would be done. The scenario below describes the level of disturbance that would most likely occur from the development of a 25-megawatt power plant.

Five to seven production wells and one or two injection wells would be drilled. Access would be provided by existing roads and new, short roads (0.5–1 mile) 18 to 20 feet wide (up to 40 feet total disturbed width). Surface disturbance from well pad and road construction would probably range from 2 to 6 acres per well. The power plant, including separators, energy converters, turbines, generators, condensers, cooling towers, and switchyard, would cover an estimated 10 to 15 acres. Pipelines and power lines would disturb an additional 3 to 6 acres. If a water cooling system is employed, one to three water wells, requiring approximately 0.25 acre per well, would be drilled, unless the cooling water was obtained from the geothermal steam condensate. Depending upon the location, terrain, geothermal reservoir characteristics, and type of generating facility, the total surface disturbance would probably range from 25 to 75 acres, most likely about 50 acres. After construction, approximately one-third to one-half of the disturbed area would be revegetated. The remaining disturbed area would be reclaimed before abandonment.

Direct use of geothermal energy: Low and moderate-temperature (300 to 500 ˚F) geothermal resources may have direct applications, including space heating and cooling of residences and businesses; applications in agriculture and industry; and recreational and therapeutic bathing. Depending on the type of use and magnitude of operation, surface disturbance could range from a few acres for a well and greenhouse or food processing facility, to tens of acres for larger agricultural or aquacultural developments. Although geothermal resources are found throughout the planning area, the small, somewhat isolated population makes any direct use of geothermal energy on public land unlikely.

Locatable Mineral Resources

Reasonably Foreseeable Development Scenarios

The major commodities of interest over the next 15 to 20 years will probably be gold/silver and zeolites. There are known occurrences of mercury in the planning area, however, this commodity is not expected to generate any interest during the life of the plan. This assessment is based on market conditions (especially for precious metals) and the favorable geologic environment for mineral occurrences. Reclamation science will continue to advance due to experience and research. More detailed design will be required for the reclamation of mined land in the future.

This will likely increase reclamation costs but should also increase long-term reclamation success. The economics of mining in the planning area will be driven by the relationship between production costs and the market price of the commodity. Whereas production costs can be controlled, or anticipated through management and technology, the price of a commodity is difficult to predict over time. The overall profitability of an operation—and hence the level of activity at the prospecting, exploration, and mining stages—for development of ore bodies is closely related to the price of the mineral commodity.

Over the next 15 to 20 years, it is expected that two mines may be developed in the planning area: one open-pit gold mine using chemical heap leaching, at least in part; and one mine of zeolites.

Background on the Development of a Locatable Minerals Mine

Typically, the development of a mine goes through five stages, with each stage using progressively more sophisticated (and more expensive) techniques over a successively smaller area to identify, develop, and produce an economic mineral deposit. The full sequence of developing a mineral project involves reconnaissance, prospecting, exploration, economic evaluation, and development.

Reconnaissance: Reconnaissance is the first stage in exploring for a mineral deposit. This involves an initial literature search for the area of interest using available references, such as publications, reports, maps, and aerial photographs. Because the study area is usually large, varying from hundreds to thousands of square miles, this stage normally involves large-scale mapping, regional geochemical and/or geophysical studies, and remote sensing with aerial or satellite imagery. These studies are generally undertaken with minimal surface disturbance, which usually consists of stream sediment, soil, or rock sampling. Minor off-highway vehicle use may be required.

Prospecting: If reconnaissance identifies anomalous geochemical or geophysical readings, rare or unusual geological features, evidence of mineralization, or a historical reference to mineral occurrence, a prospecting area of interest is identified. This area could range from a single square mile to an entire mountain range of several hundred square miles.

Activity to locate a mineral prospect includes more detailed mapping, sampling, and geochemical and geophysical study programs. This is the time when property acquisition efforts usually begin and most mining claims are located to secure ground while trying to make a mineral discovery. Surface-disturbing activities associated with prospecting include more intense soil and rock chip sampling, using mostly hand tools; frequent off-highway vehicle use; and placement and maintenance of mining claim monuments. This activity is usually considered casual use (43 CFR 3809.1-2) and does not require BLM notification or approval.

Exploration: Upon location of a sufficiently anomalous mineral occurrence or favorable occurrence indicator, a mineral prospect is established and subjected to more intense evaluation through exploration techniques. Activities during exploration include those used during prospecting, but at a more intense level and in a small area. In addition, road construction, trenching, and drilling take place. In the later stages of exploration, an exploratory adit or shaft may be driven. If the prospect already has underground workings, these may be sampled, drilled, or extended. Exploration activities use mechanized earth-moving equipment; drill rigs, etc., and may involve the use of explosives.

Typical exploration projects in the planning area could include in-stream dredging with portable suction dredges; exploratory drilling, which could include construction of new roads; use of explosives to sample rock outcroppings; and excavation of test pits. If the exploration project disturbs 5 acres or less, it is conducted under a notice (43 CFR 3809.1-3) which requires the operator to notify the BLM at least 15 days prior to beginning the activity. If a project disturbs more than 5 acres, it is conducted under a plan of operations (43 CFR 3809.1-4) and requires NEPA compliance prior to approval.

Economic evaluation: If an exploration project discovers a potentially economic deposit, activity would intensify to obtain detailed knowledge of the deposit (such as ore grade and deposit size), possible mining methods, and mineral processing requirements. This would involve applying all the previously used exploration tools in a more intense effort. Once enough information is obtained, a feasibility study would be made to decide whether to proceed with mine development and what mining and ore processing methods would be used.

Mine development: Once the decision to develop a property has been made, the mine permitting process begins. Upon approval, work begins on development of the mine infrastructure. This includes constructing the mill, offices, and laboratory; driving development workings if the property is to be an underground mine, or prestripping if it is to be an open-pit mine; building access or haul roads; and placing utility services. Evaluations of ore reserves may be refined at this time.

Once enough facilities are in place, production begins. Satellite exploration efforts may be conducted simultaneously to expand the mine's reserve base and extend the project life. The property is reclaimed concurrently with the mining operation or upon its completion. Often uneconomic resources remain unmined and the property dormant until changes in commodity prices or production technology makes these resources economically feasible to mine.

Activities on these lands include actual mining, ore processing, tailings disposal, waste rock placement, solution processing, metal refining, and placement of support facilities, such as repair shops, laboratories, and offices. Such activities require the use of heavy earth-moving equipment and explosives for mining and materials handling, exploration equipment for refining the ore reserve base, hazardous or dangerous reagents for processing requirements, and other equipment for general construction.

The size of mines varies greatly, and not all mines require all of the previously mentioned facilities and equipment. The amount of land involved can range from only a few acres to several hundred, with most projects disturbing 5 acres or less and requiring a notice pursuant to 43 CFR 3809.1-3. Projects disturbing more than 5 acres require an approved plan of operations pursuant to 43 CFR 3809.1-4.

Reasonably Foreseeable Development

Gold/Silver

Exploration: Based on mineral exploration activity over the past 10 years and known occurrences in the planning area of hot springs type gold deposits, exploration for gold is expected to take place during the life of this plan.

Depending on the market for gold, up to 25 exploration projects for hot springs gold deposits are expected over the next 15 to 20 years. A typical hot springs exploration project would involve six drill holes and approximately 0.5 mile of new road 12 feet wide (total disturbed width of 20 feet) for each drill hole, resulting in 4.2 acres of disturbance/project, or 105 acres of total disturbance.

Economic evaluation/mine development:

Exploration activity may result in the discovery 1 open-pit deposit, employing about 170 people. The possible deposit would be located in or adjacent to areas of known potential for gold/silver.

The open-pit mine is expected to contain between 10 and 90 million tons of ore, with a probable size of 15 million tons, averaging 0.06 troy ounces of gold per ton. Detailed exploration and feasibility studies would involve the construction of about 30 miles of road 12 feet wide (total disturbed width of 20 feet with ditches, cuts, and fills), and 300 drill sites, for a total disturbance of 75 acres. Development of the deposit would involve creation of an open pit, 2,100 feet in diameter and 800 feet deep; a mill complex; a cyanide heap leach pad; a tailings disposal facility; a waste disposal facility; approximately 5 miles of internal graveled haul road 90 feet wide with a total disturbance of 100 feet; and 15 miles of all-weather access road 20 feet wide (total disturbed width of 36 feet). Surface disturbance would cover 85 acres for the pit, 40 acres for the mill complex, 65 acres for the heap leach pad, 140 acres for the tailings disposal facilities, 260 acres for the waste disposal facilities, 60 acres for internal haul roads, and 65 acres for access roads. Total surface disturbance caused by this project would be 715 acres.

Industrial Minerals

Exploration: Based on mineral exploration activity over the past 10 years and known occurrences in the planning area, a moderate amount of exploration for industrial minerals—mainly zeolite—is expected during the life of this plan. Depending on market conditions, up to three projects are expected for zeolite. Exploration for this commodity consists of auger holes or trenching and road construction. An average project would involve up to 10 auger holes; 5 trenches 20–25 feet wide, 60–125 feet long, and 15–25 feet deep; and 1,000 feet of road 12 feet wide (total disturbed width of 20 feet), for a disturbance of 0.8 to 1 acre/project.

Economic evaluation/mine development: Exploration activity is not expected to result in the discovery of an economically mineable deposit. In spite of the low probability of discovery the following scenario would be appropriate based on mine models developed by the U.S. Bureau of Mines. The zeolite deposit would be expected to contain between 50,000 and 120,000 tons of ore, most probably about 85,000 tons, with an assumed moisture content of 25 percent. Development of the deposit would involve an open pit approximately 1,000 feet long by 130 feet wide by 30 feet deep, with a zeolite bed 20 feet thick; a mill complex, assumed to be on public land 15 miles off-site and adjacent to a paved road; a stockpile near the pit; 100 feet of haul road 20 feet wide (total disturbed width of 36 feet); and 10 miles of access road 20 feet wide (total disturbed width of 36 feet). Surface disturbance resulting from this mine would be 3 acres for the pit, 1 acre for the stockpile, 0.1 acre for the haul road, 44 acres for the access road, and 5 acres for the mill.

Saleable Mineral Resources

Reasonably Foreseeable Development Scenarios

The major use of saleable minerals (primarily sand and gravel and crushed/broken rock) would continue to be for road construction and maintenance by Washoe County Road Department, Nevada and Modoc County Road Department, California. Most of this activity would be routine seasonal maintenance on county roads which would result in a moderate increase in demand for the materials. Because the population of the area is expected to increase over the life of this plan, it is likely that public demand for saleable minerals will increase slightly over current levels, with the highest demand for decorative stone.

Existing sources of material would handle some of the increased demand. Many of the sites, however, have a small reserve base and could be depleted in a few years. Consequently, up to 20 new sources of material—10 sand and gravel pits, 5 rock quarries and 5 collecting areas for decorative stone—may need to be developed during the next 15 to 20 years:

Background on the Development of Saleable Mineral Deposits

Development of a saleable mineral deposit goes through a sequence similar to that for locatable minerals and includes reconnaissance, prospecting, exploration (sampling and testing), and development. Unlike the process for locatable minerals, however, written approval (such as a permit) must be obtained from the BLM and the material must be purchased by the operator (in the case of a private citizen or commercial operator) before the deposit can be developed, as required by the 1947 "Materials Act" as amended (30 U.S.C. 601 et seq.). The act also grants the Federal government discretionary authority to deny permission to develop a deposit if the damage to public land or resources would outweigh the economic benefits of development.

Reconnaissance and prospecting for saleable minerals involves a literature search, field examination, geologic mapping (if necessary), and surface sampling. Surface disturbance is usually negligible. Exploration is usually confined to a small area and generally involves drilling or core drilling to determine whether the material meets construction standards. Because exploration is normally limited to areas with good access to major roads, little or no road construction is involved. A typical operation usually involves a number of small trenches or core holes and would disturb less than 0.01 acre/site. Mine development normally involves a pit or quarry, space for processing (crusher, stockpile, and occasionally an asphalt plant), and a staging area for trucks (loading and a turnaround area). Disturbance normally covers about 2 to 3 acres/ project.

Reasonably Foreseeable Development

Exploration

During the next 15 to 20 years, up to 30 exploration projects are expected within the planning area in areas of known or suspected occurrences of mineral materials. Approximately 15 projects may be conducted for sand and gravel, 10 for rock aggregate (crushable or naturally broken material), and 5 for decorative rock.

A typical sand and gravel operation would involve up to five trenches, perhaps 8 by 10 feet and up to 20 feet deep, disturbing about 100 square feet per trench, or about 0.01 acre/project; total disturbance would be approximately 0.15 acre. A typical rock aggregate exploration project would involve up to eight core holes, disturbing about 0.01 acre/hole, or 0.1 acre/project; total disturbance would be about 1 acre. A typical decorative rock exploration project would use no mechanized equipment and would be limited to surface sampling, essentially identical to a prospecting project; surface disturbance would be negligible.

Development

Sand and gravel: During the life of the plan, it is expected that 10 new sand and gravel deposits with good quality material will be developed in easily accessible areas (such as within a few miles of major roads). Site-specific assessments required by NEPA and inventories of cultural resources and threatened and endangered species would be conducted prior to development. Existing pits would continue to be used as much as possible, with up to 20 percent closed due to depletion.

A typical development of a sand and gravel deposit would contain a pit, stockpile area, processing area (crusher, washer, screener, conveyor, and perhaps asphalt plant), truck loading and turnaround area, and about 0.5 mile of new road 20 feet wide (36 feet total disturbed width). Disturbance for each project would be 2 acres for the pit, processing, and gravel and waste stockpile and 2 acres for the access road, or approximately 4 acres/project. Total disturbance would be 40 acres.

***Rock aggregate**:* During the life of this plan, it is expected that 5 new deposits of good quality material will be developed in easily accessible areas (such as within a few miles of major roads). When the County Highway Departments need additional sources of material for major projects, highway material rights-of-way will be granted under title 23 of the "Federal Highway Act" for an estimated five deposits adjacent to highways.

Like sand and gravel, rock aggregate deposits would require site-specific NEPA assessments and inventories of cultural resources and threatened and endangered species prior to development.

A typical rock aggregate quarry would be essentially the same as a sand and gravel operation and would contain a pit, stockpile area, truck turnaround and loading area, processing area (crusher, screener, washer, conveyor, asphalt plant, etc.), and about 2,500 feet of new access road 20 feet wide (36 feet total disturbed width). Disturbance would cover 2 acres for the quarry operations and 2 acres for the access road, or 4 acres per project. Total disturbance would be 20 acres.

Decorative stone: A population increase over the next 15 to 20 years will result in a moderate increase in demand for decorative material. It is expected that five new collecting sites would be designated to meet the increase in demand. These sites would be scattered throughout the planning area and would generally be reached by existing roads. Site-specific NEPA assessments and inventories for cultural resources and threatened and endangered species would be required prior to designation.

Extraction of the material would be by surface methods only, such as loading onto pickup or flatbed trucks or pallets, by hand or by rubber-tired front-end loaders. Surface disturbance resulting from these operations would be negligible.

Appendix E

Relevance and Importance Criteria for Areas of Critical Environmental Concern in the Surprise Field Office

Areas of Critical Environmental Concern (ACEC) Relevant and Importance Criteria

Bitner Potential ACEC

Description and values: The proposed Bitner ACEC is located in northwestern Nevada, west of Massacre Lakes and the Bitner Table and south of the Sheldon Antelope Refuge. Average elevation of the area is 5,800 feet. The proposed ACEC boundary encompasses approximately 1,921 acres and contains Badger Creek and an associated meadow surrounded by rolling sageland, broken by low rimrock.

The Bitner Ranch area contains significant cultural sites which have provided important information on the prehistory and history of the area. The area has had a complete inventory and those sites that have been recorded have significant value. Precursory archaeological investigations indicate that the area was occupied by prehistoric peoples as early as 6,000 years before present until historic times. Historic use of the area began sometime around 1877 and continues to present. From a cultural resource standpoint, the information contained and provided by the multicultural components of the site meet the criteria for relevance and importance for the area.

The Nevada Natural Heritage Program (NNHP) has classified the majority of the vegetation communities occurring in Nevada. A number of these plant communities have been identified as rare, unique, or unusual. Those communities that NNHP considers to be imperiled with extinction, either globally or local to the stae, due to their rarity or other demonstrable factors would be considered relevant. Two such communities occur in, and are relevant to, the Proposed Bitner ACEC: 1) *Artemisia tridentata ssp. Tridentata/Leymus cinereus* Shrubland, and 2) *Artemisia cana/Leymus cinereus* Shrubland.

Both of these communities occur in a narrow band between the perennially wet riparian community corridor along Badger Creek and the adjacent dry upland communities. As a result, they are locally significant to the diversity of plant communities and wildlife habitat. The populations of these communities at Bitner Ranch are unusually vulnerable to adverse changes in the past. The Badger Creek system has been recognized as warranting protection to meet vegetation objectives. Although these communities occur in relatively small amounts in the Badger Creek area, they do meet the importance criteria.

The area around Bitner Ranch historically had three active Greater sage-grouse (*Centrocercus urophasianus*) strutting grounds (leks) however none are known to currently be active. The meadows associated with the ranch as well as springs above the ranch are heavily used by sage-grouse for summer brood-rearing. Because this species is widespread across the field office, this species is considered to meet the relevance criteria for ACEC designation but not the importance criteria.

Pygmy rabbit (*Brachylagus idahoensis*) are a species of recent concern and are now petitioned for listing with the USFWS. This species is known to have historically existed to the south of Bitner Ranch and on the adjacent Sheldon National Wildlife Refuge. Recent work has found pygmy rabbit along 8A to the south and an apparently “healthy” population about 13 miles to the south of the ranch near upper High Rock Canyon. Although not yet confirmed, there have been reports of this species within the proposed ACEC. Current information shows that this species may be relatively intolerant of various natural and anthropogenic disturbances. This species meets the relevance and importance criteria for ACEC designation. However, it is not felt that special management beyond what would normally take place at the project or programmatic level is necessary.

The Sheldon tui chub (*Gila bicolor eurysoma*) is a former federal C2 listed species. This list was in place for species which the USFWS felt had sufficient information to warrant a possible listing. Badger Creek contains one of the two known (and largest) populations of this species that exist on lands managed by this office. Badger Creek is perennial in the ACEC receiving water from several perennial springs in the large meadow system. The second population of Sheldon tui chub exists about 5 miles to the northwest in a separate and largely intermittent creek. This species meets the relevance and importance criteria for ACEC designation and the importance criteria. However, it is not felt that special management beyond what would normally take place at the project or programmatic level is necessary.

There are at three known historic golden eagle (*Aquila chrysaetos*) nests within 12 miles of Bitner Ranch, two of these have been active within the last two years. This species is often seen hunting within the boundaries of the proposed ACEC and may have undocumented nests along the adjacent rimrock. This species meets the relevance criteria for ACEC designation but not the importance criteria.

Massacre Rim Potential ACEC

Description and values: The proposed Massacre Rim ACEC is located in northwestern Nevada, north and northwest of Massacre Lakes. Average elevation of the area is 5,900 feet. The vegetation is composed of primarily low sagebrush dominated communities with inclusions of big sagebrush, silver sagebrush, mountain brush, and juniper. The proposed ACEC boundary encompasses approximately 44,870 acres of public land and is located within the Massacre Rim WSA.

Significant archaeological sites are contained within the Massacre Rim area. Just over 8% (3,684 acres) of the proposed ACEC has been inventoried for cultural resources. A little less than 200 archaeological sites were discovered as a result of the inventories. The prehistoric sites in the area vary in type and include lithic reduction areas, hunting blinds, hunting stations, resource processing stations, resource procurement stations, occupational sites, caves, rock shelters, and petroglyphs.

Archaeological investigations indicate that the area was occupied by prehistoric peoples as early as 11,000 years before present. Located within the proposed ACEC are areas which contain multiple archaeological sites that when combined, would be eligible to the National Register of Historic Places (NRHP) as districts. A number of individual sites are also eligible for the NRHP, two of which are the Massacre cave and the Massacre Rim Petroglyphs. From a cultural resource standpoint, the age and information provided by these sites meets the criteria for relevance and importance for the area.

There are no known or suspected populations of sensitive plant species in the area. However, three of the plant communities within the proposed ACEC have been identified by the Nevada Natural Heritage Program as rare, unique, or unusual, and imperiled with extinction either globally or local to the state, due to their rarity or other demonstrable factors. These communities include: 1) Silver sagebrush/ bluegrass shrublands, 2) Basin big sagebrush/ basin wildrye shrublands, and 3) Big sagebrush/ basin wildrye shrub herbaceous communities. These communities meet the criteria for relevance. However, they are widespread in the Surprise Resource Area, and they are not unusually fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change. The primary impacts on these communities derive from livestock and wild horse grazing. However, there is adequate management in place to mitigate impacts from livestock and wild horse grazing in these communities. As a result, vegetation in the Massacre Proposed ACEC area does not meet the importance criteria, and there is no special management needed to address conditions on the three sensitive plant communities found in the proposed ACEC.

There are at least four historic Greater sage-grouse (*Centrocercus urophasianus*) strutting grounds (leks) with two currently known to be active in the area. Survey and hunt information from the Nevada Department of Wildlife (NDOW) shows that the area within this proposed ACEC is very important as summer and fall habitat which means that the area is also very likely important as nesting habitat. Because this species is widespread across the field office, this species is considered to meet the relevance criteria for ACEC designation but not the importance criteria.

Pygmy rabbit (*Brachylagus idahoensis*) is a species of recent concern and is now petitioned for listing with the USFWS. This species is not known to have historically existed within the boundaries of the ACEC, however, several historic and currently active burrows are known from south (within 3 miles) of the boundaries of the proposed Massacre Rim ACEC, along road 8A. Considering this information along with recent research into pygmy rabbit dispersal, this species very likely exists within the proposed ACEC boundaries. Current information shows that this species may be relatively intolerant of various natural and anthropogenic disturbances. This species meets the relevance criteria for ACEC designation and the importance criteria. However, it is not felt that special management beyond what would normally take place at the project or programmatic level is necessary.

There is one historic golden eagle (*Aquila chrysaetos*) nest within the proposed boundary of the Massacre Rim ACEC and two actine ones within 4 miles of the boundary. Considering the amount of rimrock habitat available on the northeast portion of the ACEC, it s believed that there are undocumented active golden eagle nests within the boundaries of the ACEC. This species meets the relevance criteria for ACEC designation but not the importance criteria.

Important local big game species which use the proposed ACEC include pronghorn antelope (*Antilocapra americana*), mule deer (*Odocoileus hemionus*), Rocky Mountain elk (*Cervus elaphus nelsoni*), and California bighorn sheep (*Ovis canadensis californiana*). Pronghorn and mule deer have always existed within the proposed Massacre Rim ACEC, with pronghorn use as kidding habitat high. Like other places in northeastern California and northwestern Nevada, Rocky Mountain elk have recently been seen "reinvading" the northeastern portions of the area, coming down from habitats in Oregon. Bighorn were reintroduced back into the area in 1995 with a plant on the Long Valley Rim, about 2.5 miles north of the proposed ACEC boundary. Since then bighorn sheep have expanded south along the steep rimrock and talus slopes of the proposed ACEC. Due to the locally widespread nature of these species on the field office, these species are considered to meet the relevance criteria for ACEC designation but not the importance criteria.

Rahilly-Gravelly Potential ACEC/RNA

Description and values: The Rahilly-Gravelly area is located at the south end of the Warner Valley in the plateau and foothills dominated by western juniper, and tall and low sagebrush. The site runs north and south on the high hills that abut the Oregon-Nevada stateline. The elevations average 6,000 feet in the proposed area. The total area proposed is 19,648 acres.

The Rahilly-gravelly area has been subjected to more archeological surveys than most areas of the district. It is known to contain a wide variety and a high density of sites. It is also known to be an area which has traditional cultural property values for the plant resources which are found there. The University of Nevada-Reno, has conducted archaeological excavations at several sites within the region. Several large-scale archaeological surveys in connection with geothermal exploration projects have been completed in the area.

Rahilly-Gravelly has significant prehistoric and historic cultural resources present. The high density of sites, the variety of sites, and the time depth of these sites, make the area important for the study of prehistory in a plant source area important to the Northern Paiute. The area meets the criteria for relevance and importance in regard to cultural resources.

The Rahilly-Gravelly site contains scattered western juniper stands, tall sagebrush mosaic, and low sagebrush on the lithic soil flats. Prominent features of the site are the diversity of shrubs and the high quality grasses in the understory. Of particular note is the presence of squaw apple and bitterbrush along with big sagebrush in the shrub layer.

Of primary importance, the site fills the ONHP (Oregon Natural Heritage Program) cells for the Basin and Range Ecosystems (ONHP 1998a):

(6) Western juniper/big sagebrush-bitterbrush
(21) Mountain brush (mountain big sagebrush-bitterbrush-squawapple)
(4) bitterbrush-sagebrush, mountain snowberry/Thurber neddlegrass mosaic

The BLM sensitive plant species, Cooper's goldflower (*Hymenoxys cooperi*. var *canescens* = *H. lemmonii*), occurs in four places in the area; these four locations are the only populations for this plant in Oregon. This variety occurs at the northwestern edge of its range in southern Idaho, southward through Nevada to northwestern Arizona and west to eastern California. The status for ONHP is List 2 (threatened with extirpation in Oregon, may be more common elsewhere) (OHNP 1998b).

From a botanical standpoint, the Rahilly-Gravelly area meets the relevance criteria as habitat essential for maintenance of species diversity and as representative of the botanical cell need for ONHP. The site also meets the importance criteria, especially with the presence of the Bureau sensitive plant species, Cooper's goldflower.

Rahilly-Gravelly meets the criteria for a RNA, and is especially important because it exists in the ecotone where the northern Great Basin meets the sagebrush/bunchgrass steppe. The presence of squawapple, as well as the other shrubs, creates an opportunity for plant community and ecosystem biodiversity research. The variety and number of cultural sites and the research that has already taken place contributes to the importance of the area as a RNA from a cultural resources standpoint.

The northern two-thirds of the Rahilly-Gravelly proposed ACEC is within a known geothermal resource area and therefore has high potential for geothermal resources. The rest of the area has moderate potential for geothermal. The entire area has moderate potential for oil and gas. The likelihood of geothermal activity in the short term is low, but this is an important area for geothermal resource. It could be developed in the long term. The likelihood of oil and gas activity in both the short and long term is nil. The potential for occurrence of other mineral resources is low.

Presence of known critical habitat for greater sage-grouse satisfies the criteria for relevance and importance designation as an ACEC.

Appendix F

Noxious Weed Prevention Schedule for the Surprise Field Office

Surprise Integrated/Collaborative Noxious Weed Prevention Schedule

February 15, 2000

PREVENTION ACTIVITY	TIMEFRAME	RESPONSIBLE PARTY
ROADS		
1) Train Washoe County and BLM Force Account road maintenance crews in noxious weed ID and spread prevention techniques.	Spring - Fall As necessary	Weed Specialists
2) Minimize road disturbance in weed infested areas and high-risk areas.	As required	Force Account Supervisor
3) Coordinate with County and BLM road crews on road maintenance schedules and proposed activities.	As required	Weed Specialist
4) Use fill/gravel from weed-free sources. Inspect gravel pits and fill sources for noxious weeds.	As required	Geologist
5) Minimize new road construction through established and high-risk noxious weed areas.	As required	Field Manager through
6) Clean equipment of mud, debris and plant parts before leaving noxious weed infested areas.	All year	Force Account Supervisor
RANGE		
1) Monitor livestock disturbances at salt licks, watering areas and sensitive grazing areas to reduce potential weed invasion.	Field Season	Range Specialist
2) Control timing of turnout/use in infested areas to reduce seed production and transport.	Grazing Season	Field Manager through NEPA process
3) Educate permittees in noxious weed ID, locations and control efforts. Encourage users to report noxious weed locations to resource specialists.	Pre-season Mgt.	Field trips
FIRE		
1) Train fire crews in noxious weed awareness, ID and prevention techniques.	Early summer	Weed Specialist

2) Include noxious weed prevention in Resource Advisor duties. Advise IC and Resource Advisor of known noxious weed sites in or near the fires.	All year	Fire season
3) Inspect engines and equipment for noxious weed material and remove before leaving weed infested areas.	Fire season	Fire crews/ Brush crews
4) Document fuel break disturbance on prescribed burns in known noxious weed areas. Monitor area for noxious weed invasion.	Field season	Fire Management Officer
5) Ensure that fire suppression and rehabilitation efforts minimize weed spread.	Post-burn	Fire Management Officer
6) Conduct prescribed burns on noxious weeds suppressed by fire. Burn at appropriate season to optimize control efforts and seed reduction.	Spring/Summer/	Fall
7) Evaluate natural re-vegetation potential on wildland fire incidents. Emphasize re-seeding burn areas with native species to reduce weed establishment if necessary. Refer to the Emergency Fire Rehabilitation Handbook, H-1742, for guidelines.	Post-burn	Fire Management Officer
8) Prior to prescribed burns, scope the area to determine whether noxious weeds are present. Conduct monitoring post burn to check for weed invasion.	Pre and post prescribed burn	Weed Specialist
9) During the transition meeting on wildland fires, command staff will be made aware of SFO noxious weed prevention measures.	Wildland fires	Fire Management Officer
Incident Commander10) All engines, crew carriers, overhead vehicles and support vehicles will be checked for weed material, and washed down on site before leaving a fire in a known noxious weed location. Additional washing of off-unit vehicles may be required at SFO fire station or local car wash facility before release from an incident on noxious weed sites.	Fire season	Prescribed burns

WILDLIFE / FISHERIES		
1) Incorporate noxious weed prevention in all wildlife habitat improvement projects and Habitat Management Plans.	As appropriate	Wildlife Biologist
2) Emphasize critical wildlife habitat and sensitive areas where noxious weeds have invaded. Initiate control measures to reduce infestation in these areas.	As appropriate	Wildlife Biologist Weed Specialist
3) Coordinate transplanting/reintro-duction activities with Nevada Division of Wildlife and California Department of Fish and Game to eliminate spread of noxious weeds by vehicles and animals. Consider quarantine of reintroduced species.	As appropriate	Wildlife Biologist Field Manager
4) Identify Listed, T&E, and all BLM Sensitive flora and fauna in or adjacent to noxious weed infestations. Ensure that they are given consideration and protection. Inventory and flag these plants before any noxious weed treatment begin.	All year	Wildlife Biologist Botanist Weed Specialist Field Manager through NEPA process
CULTURAL		
1) Monitor known cultural sites for noxious weed infestation.	Field season	Archaeologist Weed Specialist
2) Require reseeding of archaeological site excavations with certified weed-free seed if high potential for noxious weed establishment exists.	As appropriate	Archaeologist Weed Specialist
MINERALS		
1) Require weed prevention and treatment procedures in all mining plans and activities.	As applicable	Geologist Weed Specialist Field Manager
2) Require all mining sites to be revegetated after completion of mining activities. Mandate use of certified weed-free seed and mulch.	As soon as possible after mining activity has stopped.	Geologist Weed Specialist Range Specialist Field Manager
WEED COORDINATOR		
1) Coordinate and conduct noxious weed awareness and prevention training to BLM office personnel. Present Noxious Weed Education programs to public user groups, schools and civic groups.	Pre-field season Throughout year	Weed Specialist

2) Be involved in cooperative weed management efforts with other groups, volunteers and resource agencies. Attend weed management meetings and report on SFO integrated weed management activities.	All year	Weed Specialist
3) Conduct inventory, monitoring and GPS mapping of noxious weeds on weed management area. Prepare GPS files for export to Arc Info GIS system.	Field season	Weed Specialist
4) Coordinate with Modoc County Agriculture Department and Nevada State Division of Agriculture on noxious weed treatment. Assist and supervise on treatment activities.	As necessary	Weed Specialist
5) Provide map locations of infested areas to all field personnel. Stress limited entry into these areas to reduce weed transport by contamination of vehicles and clothing.	Field season	Weed Specialist

Approved By:_____

Susie Stokke, Date
Surprise Field Manager

Appendix G

List of Species Known to Occur in the Surprise Field Office Area

Appendix G List of Species Known to Occur in the Surprise Field Office Area

Common name	Scientific name
BIRDS	
American Avocet	*Recurvirostra americana*
American Bittern	*Botaurus lentiginosus*
American Coot	*Fulica americana*
American Crow	*Corvus brachyrhynchos*
American Goldfinch	*Carduelis tristis*
American Kestrel	*Falco sparverius*
American Robin	*Turdus migratorius*
American Wigeon	*Anas americana*
Ash-throated Flycatcher	*Myiarchus cinerascens*
Audubon's warbler (subspecies of Yellow-rumped)	*Dendroica coronata*
Bald Eagle	*Haliaeetus leucocephalus*
Bank Swallow	*Riparia riparia*
Barn Owl	*Tyto alba*
Barn Swallow	*Hirundo rustica*
Belted kingfisher	*Ceryle alcyon*
Bewick's Wren	*Thryomanes bewickii*
Black Phoebe	*Sayornis nigricans*
Black Swift	*Cypseloides niger*
Black-billed Magpie	*Pica hudsonia*
Black-headed Grosbeak	*Pheucticus melanocephalus*
Black-throated Sparrow	*Amphispiza bilineata*
Blue-gray Gnatcatcher	*Polioptila caerulea*
Blue-winged teal	*Anas discors*
Bobolink	*Dolichonyx oryzivorus*
Brewer's Blackbird	*Euphagus cyanocephalus*
Brewer's Sparrow	*Spizella breweri*
Brown-headed Cowbird	*Molothrus ater*
Bullock's Oriole	*Icterus bullockii*
Burrowing Owl	*Athene cunicularia*
Bushtit	*Psaltriparus minimus*
California Gull	*Larus californicus*
California Quail	*Callipepla californica*
Calliope Hummingbird	*Stellula calliope*
Canada Goose	*Branta canadensis*
Canyon Wren	*Catherpes mexicanus*
Caspian Tern	*Sterna caspia*
Cassin's Finch	*Carpodacus cassinii*
Cedar Waxwing	*Bombycilla cedrorum*
Chipping Sparrow	*Spizella passerina*
Chukar	*Alectoris chukar*
Cinnamon Teal	*Anas cyanoptera*
Cliff Swallow	*Petrochelidon pyrrhonota*
Common Nighthawk	*Chordeiles minor*
Common Poorwill	*Phalaenoptilus nuttallii*
Common Raven	*Corvus corax*
Common Snipe	*Gallinago gallinago*
Common Yellowthroat	*Geothlypis trichas*
Cooper’s Hawk	*Accipiter cooperii*
Cordilleran Flycatcher	*Empidonax occidentalis*
Downy Woodpecker	*Picoides pubescens*
Dusky Flycatcher	*Empidonax oberholseri*

Common name	Scientific name
Eared Grebe	*Podiceps nigricollis*
European Starling (introduced species)	*Sturnus vulgaris*
Evening Grosbeak	*Coccothraustes vespertinus*
Ferruginous Hawk	*Buteo regalis*
Forster's Tern	*Sterna forsteri*
Fox Sparrow	*Passerella iliaca*
Gadwall	*Anas strepera*
Golden crowned sparrow	*Golden-crowned sparrow*
Golden Eagle	*Aquila chrysaetos*
Grasshopper Sparrow	*Ammodramus savannarum*
Gray Flycatcher	*Empidonax wrightii*
Great Horned Owl	*Bubo virginianus*
Greater Sage-Grouse	*Centrocercus urophasianus*
Greater Sandhill Crane	*Grus canadensis tabida*
Green-tailed Towhee	*Pipilo chlorurus*
Green-winged Teal	*Anas crecca*
Hairy Woodpecker	*Picoides villosus*
Horned Lark	*Eremophila alpestris*
House Finch	*Carpodacus mexicanus*
House Sparrow (introduced species)	*Passer domesticus*
House Wren	*Troglodytes aedon*
Juniper Titmouse	*Baeolophus ridgwayi*
Killdeer	*Charadrius vociferus*
Lark Sparrow	*Chondestes grammacus*
Lazuli Bunting	*Passerina amoena*
Lesser Goldfinch	*Carduelis psaltria*
Lesser Scaup	*Aythya affinis*
Lincoln Sparrow	*Melospiza lincolnii*
Loggerhead Shrike	*Lanius ludovicianus*
Long-billed Curlew	*Numenius americanus*
MacGillivray's Warbler	*Oporornis tolmiei*
Mallard	*Anas platyrhynchos*
Marsh Wren	*Cistothorus palustris*
Mountain Bluebird	*Sialia mexicana*
Mountain Chickadee	*Poecile gambeli*
Mourning Dove	*Zenaida macroura*
Nashville Warbler	*Vermivora ruficapilla*
Northern Harrier	*Circus cyaneus*
Northern Pintail	*Anas acuta*
Northern Pygmy-Owl	*Glaucidium gnoma*
Northern Rough-winged Swallow	*Stelgidopteryx serripennis*
Northern Saw-whet Owl	*Aegolius acadicus*
Northern Shoveler	*Anas clypeata*
Olive-sided Flycatcher	*Contopus cooperi*
Orange-crowned Warbler	*Vermivora celata*
Oregon Junco (subspecies of Dark-eyed)	*Junco hyemalis*
Pied-billed Grebe	*Podilymbus podiceps*
Pine Siskin	*Carduelis pinus*
Prairie Falcon	*Falco mexicanus*
Redhead	*Aythya Americana*
Red-breasted Nuthatch	*Sitta Canadensis*
Red-naped Sapsucker	*Sphyrapicus nuchalis*
Red-shafted Flicker (subspecies of Northern flicker)	*Colaptes auratus*

Common name	Scientific name
Red-tailed Hawk	*Buteo jamaicensis*
Red-winged Blackbird	*Agelaius phoeniceus*
Ring-billed Gull	*Larus delawarensis*
Ring-necked Duck	*Aythya collaris*
Ring-necked Pheasant (introduced species)	*Phasianus colchicus*
Rock Pigeon (introduced species)	*Columba livia*
Rock Wren	*Salpinctes obsoletus*
Ruddy Duck	*Oxyura jamaicensis*
Sage Sparrow	*Amphispiza belli*
Sage Thrasher	*Oreoscoptes montanus*
Savannah Sparrow	*Passerculus sandwichensis*
Say's Phoebe	*Sayornis saya*
Sharp-shinned hawk	*Accipiter striatus*
Song Sparrow	*Melospiza melodia*
Sora	*Porzana Carolina*
Spotted Sandpiper	*Actitis macularia*
Spotted Towhee	*Pipilo maculates*
Steller's Jay	*Cyanocitta stelleri*
Swainson's Hawk	*Buteo swainsoni*
Townsend's solitaire	*Myadestes townsendi*
Tree Swallow	*Tachycineta bicolor*
Turkey Vulture	*Cathartes aura*
Varied Thrush	*Ixoreus naevius*
Vesper Sparrow	*Pooecetes gramineus*
Violet-green Swallow	*Tachycineta thalassina*
Virginia Rail	*Rallus limicola*
Warbling Vireo	*Vireo gilvus*
Western Bluebird	*Sialia mexicana*
Western Grebe	*Aechmophorus occidentalis*
Western Kingbird	*Tyrannus verticalis*
Western Meadowlark	*Sturnella neglecta*
Western Scrub-Jay	*Aphelocoma californica*
Western Tanager	*Piranga ludoviciana*
Western Wood-Pewee	*Contopus sordidulus*
White-crowned Sparrow	*Zonotrichia leucophrys*
White-faced Ibis	*Plegadis chihi*
Willet	*Catoptrophorus semipalmatus*
Williamson's Sapsucker	*Sphyrapicus thyroideus*
Wilson's Phalarope	*Phalaropus tricolor*
Wilson's Snipe (formerly known as Common Snipe)	*Gallinago delicata*
Wilson's Warbler	*Wilsonia pusilla*
Yellow Warbler	*Dendroica petechia*
Yellow-breasted Chat	*Icteria virens*
Yellow-headed Blackbird	*Xanthocephalus xanthocephalus*
MAMMALS	
Least chipmunk	*Eutamius minimus*
Great Basin pocket mouse	*Perognathus parvus*
Deer mouse	*Peromyscus maniculatus*
Cottontail or brush rabbit	*Sylvilagus sp.*
Golden-mantled ground squirrel	*Callospermophilis lateralis*
Belding's ground squirrel	*Citellus beldingi*
Sagebrush vole	*Lagurus curtatus*
Northern pocket gopher	*Thomomys talpoides*

Common name	Scientific name
Pygmy rabbit	*Sylvilagus idahoensis*
Kangaroo mouse	*Microdipodops sp.*
Ord'd kangaroo rat	*Dipodomys ordii*
Townsend's ground squirrel	*Citellus townsendii*
Yellow pine chipmunk	*Eutamias amoenus*
Common porcupine	*Erethizon dorsatum*
Bushy-tailed wood rat	*Neotoma cinerea*
Northern flying squirrel	*Glaucomys sabrinas*
Chisel-toothed or Great Basin kangaroo rat	*Dipodomys microps*
Heerman kangaroo rat	*Dipodomys heermanni*
Northern grasshopper mouse	*Onychomys leucogaster*
Dark kangaroo mouse	*Microdipodops megacephalus*
Black-tailed jackrabbit or hare	*Lepus californicus*
Canyon mouse	*Peromyscus crinitus*
Long-tailed weasel	*Mustela frenata*
Western harvest mouse	*Reithrodontomys megalotis*
Piñon or Pinyon mouse	*Peromyscus truei*
White-tailed or Antelope ground squirrel	*Ammospermophilus leucurus*
Shrew (very likely Preble's)	*Sorex sp.*
Dusky-footed wood rat	*Neotoma fuscipes*
Long-tailed meadow mouse or vole	*Microtus longicaudus*
Long-tailed pocket mouse	*Perognathus formosus*
Wild horse	*Equus cabalus*
Mule deer	*Odocoileus hemionus*
Pronghorn antelope	*Antilocapra americana*
Rocky mountain elk	*Cervus elaphus nelsoni*
California bighorn sheep	*Ovis canadensis californiana*
Coyote	*Canis latrans*
Bobcat	*Lynx rufus*
Cougar	*Felis concolor*
Yellow-bellied marmot	*Marmota flaviventris*
Badger	*Taxidea taxus*
Beaver	*Castor canadensis*
Raccoon	*Procyon lotor*
Striped skunk	*Mephitis mephitis*
Muskrat	*Ondatra zibethicus*
Long-eared myotis	*Myotis evotis*
Small-footed myotis (AKA Western s.f. myotis)	*Myotis ciliolabrum*
Little brown bat	*Myotis lucifugus*
Long-legged myotis	*Myotis volans*
Pallid bat	*Antrozous pallidus*
Yuma myotis	*Myotis yumanensis*
Townsend's western big-eared bat	*Plecotus townsendii*
Western pipistrelle bat	*Pipistrellus hesperus*
Big brown bat	*Eptesicus fuscus*
Spotted bat	*Euderma maculatum*
Silver-haired bat	*Lasionycteris noctivagans*
Hoary bat	*Lasiurus cinereus*
Mexican free-tailed bat	*Tadarida brasiliensis*
AMPHIBIANS AND REPTILES	
Northern sagebrush lizard	*Sceloporus graciosus graciosus*
Great Basin rattlesnake	*Crotalus viridis lutosus*
Pacific treefrog	*Hyla regilla*
Desert horned lizard	*Phrynosoma platyrrhinos*

Common name	Scientific name
Bullfrog	*Rana catesbeiana*
Western fence lizard	*Sceloporus occidentalis*
Western toad	*Bufo boreas*
Long-nosed leopard lizard	*Gambelia wislizenii*
Western terrestrial garter snake	*Thamnophis elegans*
Northern leopard frog	*Rana pipiens*
Side-blotched lizard	*Uta stansburiana*
Short-horned lizard	*Phrynosoma hernandesi*
Northern alligator lizard (unverified)	*Gerrhonotus coeruleus*
Gopher snake	*Pituophis catenifer*
Common kingsnake (unverified)	*Lampropeltis getulus*
EUBRANCHIOPODS	
Tadpole shrimp	*Lepiduras sp.* [Likely *(L. lemmoni)*]
GASTROPODS	
Pyrgulopsis gibba	*Pyrgulopsis gibba*
FISH	
Warner sucker	*Catostomus warnerensis*
Warner valley redband trout	*Oncorhynchus mykiss spp.*
Eagle lake rainbow trout	*Salmo gairdnerii aquilarum*
Brown trout	*Salmo trutta*
Cuttbow	*Oncorhynchus clarkii x mykiss*
Redside shiner	*Richardsonius balteatus*
Speckled dace	*Rhinichthys osculus*
Wall Canyon sucker	*Catostomus sp.*
Cowhead Lake tui chub	*Gila bicolor vaccaceps*
Sheldon tui chub	*Gila bicolor eurysoma*
Smallmouth bass	*Micropterus dolomieu*

Note: This is a list of species known to use lands within the boundaries of the Surprise Field Office.

Sources: Scientific names of birds are from Sibley (2000) except where noted by "*" or "AKA" which is via Sibley and/or Scott et al. (1987). Mammals follow Ingles (1965), amphibians and reptiles follow Stebbins (1985) and eubranchiopods and gastropods follow Pennak (1989). Fish references are after various current sources including; Page and Burr (1991), U. S. Fish and Wildlife Service (1998), and U. S. Geological Survey (2002, 2003).

Appendix H

Wild and Scenic River Eligibility and Suitability

WILD AND SCENIC RIVER ELIGIBILITY AND SUITABILITY

Wild and Scenic River System

The Wild and Scenic Rivers Act of 1968 (Public Law 90-542) was passed by Congress to preserve river systems that contain outstanding features. The law was enacted during an era when many rivers were being dammed or diverted, and is intended to balance this development by ensuring that certain rivers and streams remain in their free-flowing condition. The BLM is mandated to evaluate stream segments on public lands as potential additions to the National Wild and Scenic Rivers System (NWSRS) during the Resource Management Plan (RMP) Process under Section 5(d) of the Act. The NWSRS study guidelines are found in BLM Manual 8351, U.S. Departments of Agriculture and Interior Guidelines published in Federal Register Vol. 7, No.173, September 7, 1982 and in various BLM memoranda and policy statements. Formal designation as a Wild and Scenic River requires Congressional Legislation, or designation can be approved by the Secretary of Interior if nominated by the Governor of the state containing the river segment. The following discussion provides information on how BLM considered waterways for potential inclusion in the NWSRS.

The NWSRS study process has three distinct steps:

- Determine what rivers or river segments are eligible for NWSRS designation;
- Determine the potential classification of eligible river segments as wild, scenic, recreational or any combination thereof; and
- Conduct a suitability study to determine if the river segments are suitable for designation as components of the NWSRS.

This report documents all three steps of the process for the streams in the planning area.

Eligibility of Streams in the Surprise Field Office

Identification

A variety of sources were reviewed to identify waterways which could have potential for wild and scenic river designation. They include the Nationwide Rivers Inventory List, the Outstanding Rivers List compiled by American Rivers, Inc., river segments identified in the riparian inventory (2002), and river segments identified by the planning team as having potential to meet Wild and Scenic River eligibility requirements.

The Wild and Scenic Rivers Act defines a river as a “flowing body of water or estuary or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes.”

Eligibility Determination

Each identified river segment was evaluated to determine whether it is eligible for inclusion in the NWSRS. To be eligible, a river segment must be “free flowing” and must possess at least one “outstandingly remarkable value” (ORV). These ORVs include the following values:

- Scenic
- Recreational

- Geological
- Fish
- Wildlife
- Historical
- Cultural
- Ecological
- Riparian
- Botanical
- Hydrological
- Scientific

To be considered as "outstandingly remarkable," a river related value must be a unique, rare, or exemplary feature that is significant at a comparative regional or national scale. Only one such value is needed for eligibility. All values should be directly river related, meaning they should:

- Be located in the river or on its immediate shorelands (generally within ¼ mile on either side of the river);
- Contribute substantially to the functioning of the river ecosystem; and/or
- Owe their location or existence to the presence of the river.

These are the only factors considered in determining the eligibility of a river segment. All other relevant factors are considered in determining suitability. A river need not be navigable by watercraft to be eligible. For purposes of eligibility determination, the volume of flow is sufficient if it is enough to maintain the outstandingly remarkable value(s) identified within the segment.

Table H-1 summarizes the eligibility evaluation of all identified river segments. The table includes information on the length of stream segments studied, indicates if outstandingly remarkable value(s) are present, and identifies the potential classification of each eligible segment.

Classification

The Wild and Scenic Rivers Act and subsequent interagency guidelines provide the following direction for establishing preliminary classifications for eligible rivers:

- **Wild Rivers:** Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.
- **Scenic Rivers:** Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.
- **Recreational Rivers:** Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

Suitability of Streams

Segments displayed in Table H-1 were found to be eligible for inclusion into the NWSRS. Section 4(a) of the Wild and Scenic River Act mandates that all rivers found eligible as potential additions to the NWSRS be studied as to their suitability for such a designation. The purpose of the suitability study is to provide information upon which the President of the United States can base his recommendation and Congress can make a decision.

The study report describes the characteristics that do or do not make the stream segment a worthy addition to the system, the current status of land ownership and use in the area, the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed if the area were included in the system, and several other factors. The suitability study is designed to answer these questions:

- Should the river's free–flowing character, water quality, and outstandingly remarkable values (ORV) be protected, or are one or more other uses important enough to warrant doing otherwise?
- Will the river's free-flowing character, water quality, and ORVs be protected through designation? Is it the best method for protecting the river corridor? (In answering these questions, the benefits and impacts of wild and scenic river designation must be evaluated, and alternative protection methods considered.)
- Is there a demonstrated commitment to protect the river by any nonfederal entities that may be partially responsible for implementing protective management?

Pursuant to Sections 4(a) and 5(c) of the Wild and Scenic Rivers Act, the following factors were considered and evaluated as a basis for the suitability determination for each river.

- Characteristics that do or do not make the area a worthy addition to the NWSRS.
- The current status of land ownership, minerals (surface and subsurface), and use in the area, including the amount of private land involved and associated or incompatible uses.
- The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the NWSRS. Historical or existing rights which could be adversely affected.
- The federal agency that will administer the area should it be added to the NWSRS.
- The estimated cost to the United States of acquiring necessary lands and interests in lands and of administering the area should it be added to the NWSRS.
- A determination of the degree to which the state or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the NWSRS.
- An evaluation of the adequacy of local zoning and other land use controls in protecting the river's ORVs by preventing incompatible development.
- Federal, public, state, local, or other interests in designation or non-designation of the river, including the extent to which the administrator of the river, including the cost thereof, may be shared by state, local, or other agencies and individuals. Support or opposition to the designation.
- The consistency of designation with other agency plans, programs or policies and in meeting regional objectives.

- The contribution to river system or basin integrity.
- The ability of BLM to manage the river segments under designation, or ability to protect the river area other than Wild and Scenic designation.
- The potential for water resources development.

Table H-1
Surprise Field Office
Wild and Scenic River Inventory (Streams evaluated for eligibility)

Inventoried Streams	X—Identified Outstandingly Remarkable Values P—Potential Outstandingly Remarkable Values										
							Cultural				
General Area/Stream Name	Free Flowing	Scenic	Recreational	Geologic	Wildlife	Fish	Prehistory	History	Botanic/ Ecologic	Hydrologic/ H2O Quality	Further Evaluation as WSR
Twelevmile Creek	YES	X				X					X
Rock Creek	YES		P			P	P				
Silver Creek	YES	P	P								
Wall Canyon Creek	YES		P		P	P					
Alaska Canyon Creek	YES										
Bald Mountain Canyon Drainage	YES										
Barber Creek	YES										
Bare Creek	YES										
Big Springs Drainage	YES										
Bordwell Creek	YES										
Bryant Springs Drainage	YES										
Bud Brown Creek	YES										
Bull Creek	YES										
Campodie Creek	YES										
Cedar Canyon Drainage	YES										
Chalk Hill Spring Drainage	YES										
Cherry Creek	YES										
Chester Lyons Drainage	YES										
Clover Creek	YES										
Cole Creek	YES										
Cottonwood Creek	YES										
Cowhead Slough	YES										

Inventoried Streams	X—Identified Outstandingly Remarkable Values P—Potential Outstandingly Remarkable Values										
							Cultural				
General Area/Stream Name	Free Flowing	Scenic	Recreational	Geologic	Wildlife	Fish	Prehistory	History	Botanic/ Ecologic	Hydrologic/ H2O Quality	Further Evaluation as WSR
Divine Spring Drainage	YES										
Emerson Creek	YES										
Evans Camp Drainage	YES										
Fortynine Creek	YES										
Granger Creek	YES										
Horse Creek	YES										
Indian Creek	YES										
Little Tuledad Canyon	YES										
Mahogany Creek	YES										
Mountain View Creek	YES										
No Savvy Creek	YES										
North Barber Creek	YES										
North Creek	YES										
Poison Spring Creek	YES										
Post Canyon Drainage	YES										
Quacking Aspen Creek	YES										
Red Rock Creek	YES										
Sand Creek	YES										
Selic Canyon Creek	YES										
Tenmile Creek	YES										
Texas Creek	YES										
Tuledad Canyon	YES										
Warm Springs Drainage	YES										
Willow Creek	YES										
Worland Canyon Drainage	YES										

Appendix I

Wind Energy Best Management Practices

Appendix I. WIND ENERGY BEST MANAGEMENT PRACTICES

I.1. Introduction

The following BMPs would be applied to all wind energy development projects to establish environmentally sound and economically feasible mechanisms to protect and enhance natural and cultural resources. These BMPs would be adopted as required elements of project-specific PODs and/or as ROW grant stipulations. They are categorized by development activity: site monitoring and testing, development of the POD, construction, operation, and decommissioning. The BMPs for development of the POD identify required elements of the POD needed to address potential impacts associated with subsequent phases of development.

Some of the proposed BMPs address issues that are not unique to wind energy development but that are more universal in nature, such as road construction and maintenance, wildlife management, hazardous materials and waste management, cultural resource management, and pesticide use and integrated pest management. For the most part, however, the level of detail provided by the BMPs is less specific than that provided in other, existing BLM program-specific mitigation guidance documents. As required by proposed policy, mitigation measures identified in or required by these existing program-specific guidance documents would be applied, as appropriate, to wind energy development projects; however, they are not discussed in detail in the programmatic BMPs proposed here.

In summary, stipulations governing specific wind energy projects would be derived from a number of sources: (1) the proposed BMPs discussed in this section; (2) other, existing and relevant program-specific mitigation guidance; and (3) the mitigation measures. Guidelines for applying and selecting project-specific requirements include determining whether the measure would (1) ensure compliance with relevant statutory or administrative requirements, (2) minimize local impacts associated with siting and design decisions, (3) promote post-construction stabilization of impacts, (4) maximize restoration of previous habitat conditions, (5) minimize cumulative impacts, or (6) promote economically feasible development of wind energy on BLM land.

I.2 Site Monitoring and Testing

- The area disturbed by installation of meteorological towers (i.e., footprint) shall be kept to a minimum.
- Existing roads shall be used to the maximum extent feasible. If new roads are necessary, they shall be designed and constructed to the appropriate standard.
- Meteorological towers shall not be located in or near sensitive habitats or in areas where ecological resources known to be sensitive to human activities (e.g., prairie grouse) are present.
- Installation of towers shall be scheduled to avoid disruption of wildlife reproductive activities or other important behaviors.

I.3 Plan of Development Preparation

I.3.1 General

- The BLM and operators shall contact appropriate agencies, property owners, and other stakeholders early in the planning process to identify potentially sensitive land uses and issues, rules that govern wind energy development locally, and land use concerns specific to the region.

- Available information describing the environmental and sociocultural conditions in the vicinity of the proposed project shall be collected and reviewed as needed to predict potential impacts of the project.
- The project shall be planned to avoid, if possible, minimize, or mitigate impacts to wildlife, habitat, visual resources, surface water resources, cultural and historical resources, other valued resources, and other land use.
- The Federal Aviation Administration (FAA)-required notice of proposed construction shall be made as early as possible to identify any air safety measures that would be required.
- To plan for efficient use of the land, necessary infrastructure requirements shall be consolidated wherever possible, and current transmission and market access shall be evaluated carefully.
- The project shall be planned to utilize existing roads and utility corridors to the maximum extent feasible, and to minimize the number and length/size of roads, lay-down areas, and borrow areas.
- A monitoring program shall be developed to ensure that environmental conditions are monitored during the construction, operation, and decommissioning phases. The monitoring program requirements, including adaptive management strategies, shall be established at the project level to ensure that potential adverse impacts of wind energy development are mitigated.
- The monitoring program shall identify the monitoring requirements for each environmental resource present at the site, establish metrics against which monitoring observations can be measured, identify potential mitigation measures, and establish protocols for incorporating monitoring observations and additional mitigation measures into standard operating procedures and BMPs.
- "Good housekeeping" procedures shall be developed to ensure that during operations the site will be kept clean of debris, garbage, fugitive trash or waste, and graffiti to prohibit scrap heaps and dumps; and to minimize storage yards.

I.3.2 Wildlife and Other Ecological Resources

- Operators shall review existing information on species and habitats in the vicinity of the project area to identify potential concerns.
- Operators shall conduct surveys for federally and/or state-protected species and other species of concern (including special status plant and animal species) within the project area and design the project to avoid, if possible, minimize, or mitigate impacts to these resources.
- Operators shall identify important, sensitive, or unique habitats in the vicinity of the project and design the project to avoid, if possible, minimize, or mitigate impacts to these habitats (e.g., locate the turbines, roads, and ancillary facilities in the least environmentally sensitive areas; i.e., away from riparian habitats, streams, wetlands, drainages, or critical wildlife habitats).
- BLM shall prohibit the disturbance of any population of federally listed plant species.
- Operators shall evaluate avian and bat use of the project area and, design the project to minimize or mitigate the potential for bird and bat strikes (e.g., development shall not occur in riparian habitats and wetlands). Scientifically rigorous avian and bat use surveys shall be conducted; the amount and extent of ecological baseline data required shall be determined on a project basis.
- Turbines shall be configured to avoid landscape features known to attract raptors.
- Operators shall determine the presence of bat colonies and avoid placing turbines near known bat hibernation, breeding, and maternity/nursery colonies; in known migration corridors; or in known flight paths between colonies and feeding areas.

- Operators shall determine the presence of active raptor nests (i.e., raptor nests used during the breeding season). Measures to reduce raptor use at a project site (e.g., minimize road cuts, maintain either no vegetation or nonattractive plant species around the turbines) shall be considered.
- A habitat restoration plan shall be developed to avoid, if possible, minimize, or mitigate negative impacts on vulnerable wildlife while maintaining or enhancing habitat values for other species.
- The plan shall identify revegetation, soil stabilization, and erosion reduction measures that shall be implemented to ensure that all temporary use areas are restored. The plan shall require that restoration occur as soon as possible after completion of activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.
- Procedures shall be developed to mitigate potential impacts to special status species. Such measures could include avoidance, relocation of project facilities or lay-down areas, and/or relocation of biota.
- Facilities shall be designed to discourage their use as perching or nesting substrates by birds. For example, power lines and poles shall be configured to minimize raptor electrocutions and discourage raptor and raven nesting and perching.

I.3.3 Visual Resources

- The public shall be involved and informed about the visual site design elements of the proposed wind energy facilities. Possible approaches include conducting public forums for disseminating information, offering organized tours of operating wind developments, and using computer simulation and visualization techniques in public presentations.
- Turbine arrays and turbine design shall be integrated with the surrounding landscape. Design elements to be addressed include clustering of turbines, visual uniformity, use of tubular towers, proportion and color of turbines, nonreflective paints, and prohibition of commercial messages on turbines.
- Other site design elements shall be integrated with the surrounding landscape. Elements to address include minimizing the profile of the ancillary structures, burial of cables, prohibition of commercial symbols, and security lighting. Regarding lighting, efforts shall be made to minimize the need for and amount of lighting on ancillary structures.

I.3.4 Roads

- An access road siting and management plan shall be prepared incorporating existing BLM standards regarding road design, construction, and maintenance such as those described in the BLM 9113 Manual (BLM 1985) and the Surface Operating Standards for Oil and Gas Exploration and Development (RMRCC 1989) (i.e., the Gold Book).

I.3.5 Transportation

- A comprehensive transportation plan shall be developed, particularly for the transport of turbine components, main assembly cranes, and other large pieces of equipment. The plan shall consider specific object sizes, weights, origin, destination, and unique handling requirements and shall evaluate alternative transportation approaches. In addition, the process to be used to comply with unique state requirements and to obtain all necessary permits shall be clearly identified.

- A traffic management plan shall be prepared for the site access roads to ensure that no hazards would result from the increased truck traffic and that traffic flow would not be adversely impacted. This plan shall incorporate measures such as informational signs, flaggers when equipment may result in blocked throughways, and traffic cones to identify any necessary changes in temporary lane configuration.

I.3.6 Noise

- Proponents of a wind energy development project shall take measurements to assess the existing background noise levels at a given site and compare them with the anticipated noise levels associated with the proposed project.

I.3.7 Noxious Weeds and Pesticides

- Operators shall develop a plan for control of noxious weeds and invasive species, which could occur as a result of new surface disturbance activities at the site. The plan shall address monitoring, education of personnel on weed identification, the manner in which weeds spread, and methods for treating infestations. The use of certified weed-free mulching and the cleaning of vehicles prior to arrival at a location to avoid the introduction of invasive weeds shall be required.
- If pesticides are used on the site, an integrated pest management plan shall be developed to ensure that applications would be conducted within the framework of BLM and DOI policies and entail only the use of EPA-registered pesticides. Pesticide use shall be limited to nonpersistent, immobile pesticides and shall only be applied in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.

I.3.8 Cultural/Historic Resources

- The BLM shall consult with Indian Tribal governments early in the planning process to identify issues regarding the proposed wind energy development, including issues related to the presence of cultural properties, access rights, disruption to traditional cultural practices, and impacts to visual resources important to the Tribe(s).
- The presence of archaeological sites and historic properties in the area of potential effect shall be determined on the basis of a records search of recorded sites and properties in the area and/or, depending on the extent of existing information, an archaeological survey. Archaeological sites and historic properties present in the area of potential effect shall be reviewed to determine whether they meet the criteria of eligibility for listing on the National Register of Historic Places (NRHP).
- If cultural resources are present at the site, or if areas with a high potential to contain cultural material have been identified, a cultural resources management plan (CRMP) shall be developed.
- This plan shall address mitigation activities to be taken for cultural resources found at the site. Avoidance of the area is always the preferred mitigation option.
- Other mitigation options include archaeological survey and excavation (as warranted) and monitoring. If an area exhibits a high potential, but no artifacts were observed during an archaeological survey, monitoring by a qualified archaeologist could be required during all excavation and earthmoving in the high potential area. A report needs to be prepared documenting these activities. The CRMP also shall (1) establish a monitoring program, (2) identify measures to prevent potential looting/vandalism or erosion impacts, and (3) address the education of workers and the public to make them aware of the consequences of unauthorized collection of artifacts and destruction of property on public land.

I.3.9 Paleontological Resources

- Operators shall determine whether paleontological resources exist in a project area on the basis of the sedimentary context of the area, a records search for past paleontological finds in the area, and/or, depending on the extent of existing information, a paleontological survey.
- If paleontological resources are present at the site, or if areas with a high potential to contain paleontological material have been identified, a paleontological resources management plan shall be developed. This plan shall include a mitigation plan for collection of the fossils; mitigation could include avoidance, removal of fossils, or monitoring. If an area exhibits a high potential but no fossils were observed during survey, monitoring by a qualified paleontologist could be required during all excavation and earthmoving in the sensitive area. A report needs to be prepared documenting these activities. The paleontological resources management plan also shall (1) establish a monitoring program, (2) identify measures to prevent potential looting/vandalism or erosion impacts, and (3) address the education of workers and the public to make them aware of the consequences of unauthorized collection of fossils on public land.

I.3.10 Hazardous Materials and Waste Management

- Operators shall develop a hazardous materials management plan addressing storage, use, transportation, and disposal of each hazardous material anticipated to be used at the site. The plan shall identify all hazardous materials that would be used, stored, or transported at the site. It shall establish inspection procedures, storage requirements, storage quantity limits, inventory control, nonhazardous product substitutes, and disposition of excess materials. The plan shall also identify requirements for notices to federal and local emergency response authorities and include emergency response plans.
- Operators shall develop a waste management plan identifying the waste streams that are expected to be generated at the site and addressing hazardous waste determination procedures, waste storage locations, waste-specific management and disposal requirements, inspection procedures, and waste minimization procedures. This plan shall address all solid and liquid wastes that may be generated at the site.
- Operators shall develop a spill prevention and response plan identifying where hazardous materials and wastes are stored on site, spill prevention measures to be implemented, training requirements, appropriate spill response actions for each material or waste, the locations of spill response kits on site, a procedure for ensuring that the spill response kits are adequately stocked at all times, and procedures for making timely notifications to authorities.

I.3.11 Storm Water

- Operators shall develop a storm water management plan for the site to ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion.

I.3.12 Human Health and Safety

- A safety assessment shall be conducted to describe potential safety issues and the means that would be taken to mitigate them, including issues such as site access, construction, safe work practices, security, heavy equipment transportation, traffic management, emergency procedures, and fire control.

- A health and safety program shall be developed to protect both workers and the general public during construction, operation, and decommissioning of a wind energy project. Regarding occupational health and safety, the program shall identify all applicable federal and state occupational safety standards, establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses; Occupational Safety and Health Administration [OSHA] standard practices for safe use of explosives and blasting agents; measures for reducing occupational electric and magnetic fields [EMF] exposures), establish fire safety evacuation procedures, and define safety performance standards (e.g., electrical system standards, lightning protection standards). The program shall include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies shall be established.
- Regarding public health and safety, the health and safety program shall establish a safety zone or setback for wind turbine generators from residences and occupied buildings, roads, rights of ways, and other public access areas that is sufficient to prevent accidents resulting from the operation of wind turbine generators. It shall identify requirements for temporary fencing around staging areas, storage yards, and excavations during construction or decommissioning activities.

  It shall also identify measures to be taken during the operations phase to limit public access to facilities (e.g., permanent fencing would be installed only around electrical substations, and turbine tower access doors would be locked).
- Operators shall consult with local planning authorities regarding increased traffic during the construction phase, including an assessment of the number of vehicles per day, their size, and type. Specific issues of concern (e.g., location of school bus routes and stops) shall be identified and addressed in the traffic management plan.
- If operation of the wind turbines is expected to cause significant adverse impacts to nearby residences and occupied buildings from shadow flicker, low-frequency sound, or EMF, site specific recommendations for addressing these concerns shall be incorporated into the project design (e.g., establishing a sufficient setback from turbines).
- The project shall be planned to minimize electromagnetic interference (EMI) (e.g., impacts to radar, microwave, television, and radio transmissions) and comply with FCC regulations. Signal strength studies shall be conducted when proposed locations have the potential to impact transmissions. Potential interference with public safety communication systems (e.g., radio traffic related to emergency activities) shall be avoided.
- The project shall be planned to comply with FAA regulations, including lighting regulations, and to avoid potential safety issues associated with proximity to airports, military bases or training areas, or landing strips.
- Operators shall develop a fire management strategy to implement measures to minimize the potential for a human-caused fire.

I.4 Construction

I.4.1 General

- All control and mitigation measures established for the project in the POD and the resource specific management plans that are part of the POD shall be maintained and implemented throughout the construction phase, as appropriate.
- The area disturbed by construction and operation of a wind energy development project (i.e., ootprint) shall be kept to a minimum.

- The number and size/length of roads, temporary fences, lay-down areas, and borrow areas shall be minimized.
- Topsoil from all excavations and construction activities shall be salvaged and reapplied during reclamation.
- All areas of disturbed soil shall be reclaimed using weed-free native grasses, forbs, and shrubs. Reclamation activities shall be undertaken as early as possible on disturbed areas.
- All electrical collector lines shall be buried in a manner that minimizes additional surface disturbance (e.g., along roads or other paths of surface disturbance). Surface lines may be used in cases where burial of lines would result in further habitat disturbance.
- Operators shall identify unstable slopes and local factors that can induce slope instability (such as groundwater conditions, precipitation, earthquake activities, slope angles, and the dip angles of geologic strata). Operators also shall avoid creating excessive slopes during excavation and blasting operations. Special construction techniques shall be used where applicable in areas of steep slopes, erodible soil, and stream channel crossings.
- Erosion controls that comply with county, state, and federal standards shall be applied. Practices such as jute netting, silt fences, and check dams shall be applied near disturbed areas.

I.4.2 Wildlife

- Guy wires on permanent meteorological towers shall be avoided.
- In accordance with the habitat restoration plan, restoration shall be undertaken as soon as possible after completion of construction activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats.
- All construction employees shall be instructed to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship, nesting) seasons. In addition, pets shall not be permitted on-site.

I.4.3 Visual

- Operators shall reduce visual impacts during construction by minimizing areas of surface disturbance, controlling erosion, using dust suppression techniques, and restoring exposed soils as closely as possible to their original contour and vegetation.

I.4.4 Roads

- Existing roads shall be used, but only if in safe and environmentally sound locations. If new roads are necessary, they shall be designed and constructed to the appropriate standard and be no higher than necessary to accommodate their intended functions (e.g., traffic volume and weight of vehicles). Excessive grades on roads, road embankments, ditches, and drainages shall be avoided, especially in areas with erodible soils. Special construction techniques shall be used, where applicable. Abandoned roads and roads that are no longer needed shall be recontoured and revegetated.
- Access roads and on-site roads shall be surfaced with aggregate materials, wherever appropriate.
- Access roads shall be located to follow natural contours and minimize side hill cuts.
- Roads shall be located away from drainage bottoms and avoid wetlands.
- Roads shall be designed so that changes to surface water runoff are avoided and erosion is not initiated.

- Access roads shall be located to minimize stream crossings. All structures crossing streams shall be located and constructed so that they do not decrease channel stability or increase water velocity. Operators shall obtain all applicable federal and state permits.
- Existing drainage systems shall not be altered, especially in sensitive areas such as erodible soils or steep slopes. Potential soil erosion shall be controlled at culvert outlets with appropriate structures. Catch basins, roadway ditches, and culverts shall be cleaned and maintained regularly.

I.4.5 Transportation

- Project personnel and contractors shall be instructed and required to adhere to speed limits commensurate with road types, traffic volumes, vehicle types, and site-specific conditions, to ensure safe and efficient traffic flow and to reduce wildlife collisions and disturbance and airborne dust.
- Traffic shall be restricted to the roads developed for the project. Use of other unimproved roads shall be restricted to emergency situations.
- Signs shall be placed along construction roads to identify speed limits, travel restrictions, and other standard traffic control information. To minimize impacts on local commuters, consideration shall be given to limiting construction vehicles traveling on public roadways during the morning and late afternoon commute time.

I.4.6 Air Emissions

- Dust abatement techniques shall be used on unpaved, un-vegetated surfaces to minimize airborne dust.
- Speed limits (e.g., 25 mph [40 km/h]) shall be posted and enforced to reduce airborne fugitive dust.
- Construction materials and stockpiled soils shall be covered if they are a source of fugitive dust.
- Dust abatement techniques shall be used before and during surface clearing, excavation, or blasting activities.

I.4.7 Excavation and Blasting Activities

- Operators shall gain a clear understanding of the local hydrogeology. Areas of groundwater discharge and recharge and their potential relationships with surface water bodies shall be identified.
- Operators shall avoid creating hydrologic conduits between two aquifers during foundation excavation and other activities.
- Foundations and trenches shall be backfilled with originally excavated material as much as possible. Excess excavation materials shall be disposed of only in approved areas or, if suitable, stockpiled for use in reclamation activities.
- Borrow material shall be obtained only from authorized and permitted sites. Existing sites shall be used in preference to new sites.
- Explosives shall be used only within specified times and at specified distances from sensitive wildlife or streams and lakes, as established by the BLM or other federal and state agencies.

I.4.8 Noise

- Noisy construction activities (including blasting) shall be limited to the least noise-sensitive times of day (i.e., daytime only between 7 a.m. and 10 p.m.) and weekdays.

- All equipment shall have sound-control devices no less effective than those provided on the original equipment. All construction equipment used shall be adequately muffled and maintained.
- All stationary construction equipment (i.e., compressors and generators) shall be located as far as practicable from nearby residences.
- If blasting or other noisy activities are required during the construction period, nearby residents shall be notified in advance.

I.4.9 Cultural and Paleontological Resources

- Unexpected discovery of cultural or paleontological resources during construction shall be brought to the attention of the responsible BLM authorized officer immediately. Work shall be redirected to avoid further harm, while the resources are evaluated and appropriate mitigation strategies are developed.

I.4.10 Hazardous Materials and Waste Management

- Secondary containment shall be provided for all on-site hazardous materials and waste storage, including fuel. In particular, fuel storage (for construction vehicles and equipment) shall be a temporary activity occurring only for as long as is needed to support construction and decommissioning activities.
- Wastes shall be properly containerized and removed periodically for disposal at appropriate offsite permitted disposal facilities.
- In the event of an accidental release to the environment, the operator shall document the event, including a root cause analysis, appropriate corrective actions taken, and a characterization of the resulting environmental or health and safety impacts. Documentation of the event shall be provided to the BLM authorized officer and other federal and state agencies, as required.
- Any wastewater generated in association with temporary, portable sanitary facilities shall be periodically removed by a licensed hauler and introduced into an existing municipal sewage treatment facility. Temporary, portable sanitary facilities provided for construction crews shall be adequate to support expected on-site personnel and shall be removed at completion of construction activities.

I.4.11 Public Health and Safety

- Temporary fencing shall be installed around staging areas, storage yards, and excavations during construction to limit public access.

I.5 Operation

I.5.1 General

- All control and mitigation measures established for the project in the POD and the resource specific management plans that are part of the POD shall be maintained and implemented throughout the operational phase, as appropriate. These control and mitigation measures shall be reviewed and revised, as needed, to address changing conditions or requirements at the site, throughout the operational phase. This adaptive management approach would help ensure that impacts from operations are kept to a minimum.
- Inoperative turbines shall be repaired, replaced, or removed in a timely manner. Requirements to do so shall be incorporated into the due diligence provisions of the ROW authorization.

Operators will be required to demonstrate due diligence in the repair, replacement, or removal of turbines; failure to do so could result in termination of the ROW authorization.

I.5.2 Wildlife

- Employees, contractors, and site visitors shall be instructed to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship, nesting) seasons. In addition, any pets shall be controlled to avoid harassment and disturbance of wildlife.
- Observations of potential wildlife problems, including wildlife mortality, shall be reported to the BLM authorized officer immediately.

I.5.3 Ground Transportation

- On-going ground transportation planning shall be conducted to evaluate road use, minimize traffic volume, and ensure that roads are maintained adequately to minimize associated impacts.

I.5.4 Monitoring Program

- Protocols defined in the site monitoring program for incorporating monitoring program observations and additional mitigation measures into standard operating procedures and BMPs to minimize future environmental impacts shall be implemented.
- Results of monitoring program efforts shall be provided to the BLM authorized officer.

I.5.5 Public Health and Safety

- Permanent fencing shall be installed and maintained around electrical substations, and turbine tower access doors shall be locked to limit public access.
- In the event an installed wind energy development project results in EMI, the operator shall work with the owner of the impacted communications system to resolve the problem. Additional warning information may also need to be conveyed to aircraft with onboard radar systems so that echoes from wind turbines can be quickly recognized.

I.6 Decommissioning

I.6.1 General

- Prior to the termination of the ROW lease, a decommissioning plan shall be developed and approved by BLM. The decommissioning plan shall include a site reclamation plan and monitoring program.
- All management plans, BMPs, and stipulations developed for the construction phase shall be applied to similar activities during the decommissioning phase.
- All turbines and ancillary structures shall be removed from the site.
- Topsoil from all decommissioning activities shall be salvaged and reapplied during final reclamation.
- All areas of disturbed soil shall be reclaimed using weed-free native shrubs, grasses, and forbs.
- The vegetation cover, composition, and diversity shall be restored to values commensurate with the ecological setting.

Appendix J

Management of Lands with Wilderness Characteristics

APPENDIX J

MANAGEMENT OF LANDS WITH WILDERNESS CHARACTERISTICS

MANAGEMENT DIRECTION

Management of Lands with Wilderness Characteristics is part of BLM's multiple-use mandate, and is recognized within the spectrum of resource values and uses.

Public lands with wilderness characteristics generally:

- Have been affected primarily by the forces of nature, with the imprint of humans substantially unnoticeable,
- Have outstanding opportunities for solitude or a primitive and unconfined type of recreation,
- Have at least five thousand acres of land or of sufficient size as to make practicable its preservation and use in unimpaired condition, and
- Potentially containing ecological, geological, or other features of scientific, educational, scenic, or historical value.

With exceptions, public lands having wilderness characteristics should be managed to protect these values. In addition, they should augment multiple-use management of the Alturas Field Office and adjacent lands particularly for the protection of watersheds and water yield, wildlife habitat, natural plant communities, and similar natural values.

With exceptions, the following activities generally do not occur within lands having wilderness characteristics:

- Commercial enterprises
- Permanent roads
- Temporary roads
- Use of motor vehicles
- Use of motorized equipment
- Use of motorboats
- Landing of aircraft
- Mechanical transport
- Structures Installations

However, there are exceptions to these prohibitions and they are generally grouped into three categories.

- Valid Existing Rights. Prior-existing rights may continue. New discretionary uses that create valid existing rights are not allowed.
- Administrative Activities. New commercial activities or new permanent roads will not be authorized. BLM may authorize any of the other prohibitions if it is necessary to meet the minimum requirements to administer and protect the lands with wilderness character (called the "minimum requirement exception") and to protect the health and safety of persons within the area.

- Other General Allowances. Subject to limitations determined by the State Director, general allowances could include actions necessary to control fire, insects, and diseases, recurring Federal mineral surveys, established livestock grazing, commercial services to the extent necessary for activities which are proper for realizing the recreational or other wilderness character purposes and compatible with the defined values, and adequate access to in-holdings.

SPECIFIC GUIDANCE

1. Emergencies. The use of motor vehicles and mechanical transport, and the construction of temporary roads, structures, and installations is allowed for emergency purposes and when consistent with the management principles of the Alturas Field Office and the "minimum requirement exceptions."

2. Land Disposals, Rights-of-Ways, Use Authorizations. These lands will be retained in public ownership. They will not be disposed through any means, including public sales, exchanges, patents under the Recreation and Public Purposes Act, color of title Class II, desert land entries (except where a vested right was established prior to October 21, 1976) or State selections. Disposals may be permitted under normal BLM procedures for mining patents, color of title Class I, and desert land entries in which a vested right was established. Prior existing rights, such as leases under the Recreation and Public Purposes Act, leases/permits under 43 CFR 2920, and rights-of-ways (ROWs) may continue. These also could be renewed if they are still being used for their authorized purpose. New authorizations, leases, permit, and ROWs will not be authorized since they are considered new valid rights.

3. Routes of Travel. The construction of new permanent roads will not be allowed. New temporary roads could be allowed if the BLM determines it is consistent with the "minimum requirement exception," if it is necessary to protect the health and safety of persons within the area, or if necessary to control fire, insects, and diseases.

Motorized or mechanized use of the existing routes is allowed subject to prescriptions outlined in the route designation process or stipulations identified in an authorization. Unless stipulated in the plan, any motorized or mechanized uses off those routes of travel will not be allowed.

4. Mining. Existing and new mining operations will be regulated using the 43 CFR 3809 regulations to prevent unnecessary and undue degradation of the lands.

5. Mineral Leasing. Existing mineral leases represent a valid existing right. These rights are dependent upon the specific terms and conditions of each lease. Existing leases will be regulated to prevent unnecessary or undue degradation.

No new surface occupancy leases will be issued. Non-surface occupancy leases may be issued if they will not impact the area's wilderness character. This applies to public lands, including split-estate.

6. Grazing. Existing livestock grazing, and the activities and facilities that support a grazing program are permitted to continue at the same level and degree, subject to any additional prescriptions.

Adjustments in the numbers and kind of livestock permitted to graze would be made as a result of revisions in the land use plan. Consideration is given to range condition, the protection of the range resource from deterioration, and protection of the wilderness character of the area.

The construction of new grazing facilities would be permitted if they are primarily for the purpose of protecting wilderness characteristics and more effective management of resources, rather than to accommodate increased numbers of livestock.

The use of motorized equipment for emergency purposes is allowed.

7. Fire Management. Fire management will be consistent with Bureau policy. Fires must be controlled to prevent the loss of human life or property. They must also be controlled to prevent the spread of fires to areas outside of Lands With Wilderness Character where life, resources, or property may be threatened.

Human caused wildfires will be prevented and/or controlled. It may be appropriate to allow natural fires to burn in conformity with a fire management plan. Prescribed fires are allowed in conformity with a fire management plan so long as it consistent in improving or maintaining the areas wilderness character.

Light-on-the-land fire management techniques will be applied.

New fire management structures are allowed if it is necessary to meet the minimum requirements to administer and protect the Lands With Wilderness Character and to protect the health and safety of persons within the area.

8. Forest/Vegetation Health. Insects, disease, and invasive species may be controlled if determined that it is necessary to meet the minimum requirements to administer and protect these lands.

Insect and disease outbreaks must not be artificially controlled, except to protect timber or other valuable resources outside the Land With Wilderness Character, or in special instances when the loss to resources within these lands is undesirable.

Vegetative manipulation to control noxious, exotic, or invasive species is allowed when there is no effective alternative and when the control is necessary to maintain the natural ecological balances within the area. Control may include manual, chemical, and biological treatment provided it will not cause adverse impacts to the wilderness character.

Where naturalness has been impacted by past timber harvesting, forest stand treatments such as thinnings would be allowed in limited areas, as long as the primary purpose is to accelerate to return these impacted areas to a natural character.

9. Recreation. Primitive and unconfined recreational uses such as hiking, camping, rock climbing, caving, fishing, hunting, trapping, etc. are allowed on these lands. Recreational uses will not be allowed if they require:

- Motor vehicles or mechanical transport (e.g, mountain bikes) off routes designated as open or limited as designated through the route designation process.
- The use of motorboats.
- Permanent structures or installations (other than tents, tarpaulins, temporary corrals, and similar devices for overnight camping).

New commercial services will not be allowed unless they are necessary for realizing the primitive and unconfined recreational values. An example of an allowed commercial service would be an outfitting and guide service. Existing commercial recreational authorizations may be allowed to continue under its terms and conditions to their expiration date.

Recreational or hobby collecting of mineral specimens when conducted without location of a mining claim may be allowed. This use will be limited to hand collection and detection equipment.

10. Cultural and Paleontological Resources. Cultural and paleontological resources are recognized as unique and valuable. They are also important supplemental values to an area's wilderness character.

Resource inventories, studies, and research involving surface examination may be permitted if it benefits wilderness values. This same standard applies for the salvage of archeological and paleontological sites; rehabilitation, stabilization, reconstruction, and restoration work on historic structures; excavations; and extensive surface collection may also be permitted for a specific project.

Permanent physical protection, such as fences, will be limited to those measures needed to protect resources eligible for the National Register of Historic Places and will be constructed so as to minimize impacts on apparent naturalness.

11. Wildlife Management. Fish and wildlife resources are a special feature that may contribute to an area's wilderness character. Whenever possible, these resources should be managed to maintain that character.

Nothing will be construed as affecting the jurisdiction or responsibilities of the State agencies with respect to fish and wildlife management on these lands. Fishing, hunting and trapping are legitimate activities on these lands. The State establishes regulations and enforcement for these uses.

State wildlife agencies and the BLM are responsible for fostering a mutual understanding and cooperation in the management of fish and wildlife. Management activities on these lands will emphasize the protection of natural processes. Management activities will be guided by the principle of doing the minimum necessary to manage the area to preserve its natural character.

Management of public lands having wilderness character will follow the guidelines provided in the Memorandum of Understanding between the BLM and the International Association of Fish and Wildlife Agencies. It will also follow any additional site-specific wildlife decisions addressed through the land use planning process.

APPENDIX K

Public Comment Responses

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INTRODUCTION

This comment response appendix for the BLM Surprise Field Office's PRMP / FEIS identifies and provides responses to public comments that were received on the Draft RMP EIS. During the public comment period, which extended from April 28 to July 27, 2006, 36 comment letters, totaling 547 comments were received from individuals, agencies, and organizations. Each comment letter typically contained multiple individual comments on one or more of the topics addressed in the Draft RMP EIS. A full listing of commenters, including name, affiliation, and comment number is provided in Table K-1. Table K-1 also identifies the topics addressed in each individual's comment letter, to assist the commenter in locating his or her comments and responses within the appendix. Comments were received in letters, electronic mail messages, and facsimiles.

The commenters include Federal, state, tribal, and local officials; public interest groups; and private citizens. The breakdown of respondents and number of comments is as follows:

- 13 comment submissions from public agencies, containing a total of 222 individual comments;
- 14 comment submissions from organizations, containing a total of 174 individual comments;
- 9 unique comment submissions from individuals and local landowners, containing a total of 151 individual comments.

A summary of major changes made in the PRMP, in response to public comment, is provided in Chapter 1.11. The comment letters are provided on a compact disc in the back flap of this volume (Volume 2). Individual comments within each letter are identified by numbers in the left-hand margin of the letter. A two-part reference number was used for each individual comment: the first number is the number assigned to each letter / commenter and the second number identifies the individual topic-specific comment.

Comment summaries, by topic, and responses to comments are provided in this appendix. The comment summaries provide a brief overview of the comments for the reader's convenience in reviewing the responses, and are not intended to provide a complete representation or interpretation of the comment's meaning. BLM's responses are based on the comments in the letters themselves.

Twelve of the Surprise commenters included comments on the Alturas and/or Eagle Lake Field Office Draft RMP EISs within a single comment letter. While all comments within the letter were numbered, only those relevant to Surprise are summarized and addressed in this appendix. Comments pertaining only to the Alturas or Eagle Lake Draft RMP EISs are summarized and addressed in the respective comment response appendices of the PRMP / FEISs for those field offices; commenter numbers may differ among the documents prepared for the three different field offices.

The comment entries are organized according to comment categories, as listed in the Table of Contents for this appendix. Comment responses for topics under each category provide: (1) a list of the comment numbers addressed in that response, (2) a summary of the comments, and (3) the response. Frequently, more than one commenter submitted identical or similar comments; in those cases, comments were grouped together, summarized, and given a single response. Also, where a single response addressed several unique comments, these comments were summarized as a set.

In compliance with the provisions of NEPA and CEQ regulations, public comments on the Draft RMP EIS were assessed both individually and collectively by BLM. Some comments resulted in changes or modifications to the PRMP / FEIS. Comments that were not associated with modifications to the PRMP / FEIS may have generated responses to correct readers' misinterpretations, to explain or communicate government policy, to clarify the scope of the PRMP / FEIS, to explain the relationship of the PRMP / FEIS to other NEPA documents, to refer commenters to other information in the PRMP / FEIS/ to answer technical questions, or to further explain technical issues.

The Record of Decision will present the decisions made by BLM, and will reflect consideration of these public comments on the Draft RMP EIS.

TABLE K-1
SUMMARY OF COMMENT LETTERS ON SURPRISE DRAFT RMP EIS

Commenter Number	Commenter Name	Commenter Affiliation	Comment Categories
1	Alice Baldrica	Nevada SHPO	Cultural, ACECs, Public involvement / interagency coordination
2	Joe and Joan Becker		Recreation and visitor services
3	Brad Beffort	Friends of Nevada Wilderness	Lands and realty, Travel management, Public involvement / interagency coordination
4	DeEllen Brasher	Navy Region Southwest	Public involvement / interagency coordination
5	Stuart Brown	Double Horseshoe Ranch	Lands and realty, Livestock grazing, WSAs, Travel management
6	Frank Cady	Lassen Municipal Utility District	Energy and minerals, Lands and realty
7	Karen Coulter	League of Wilderness Defenders	Alternatives-general, Energy and minerals, Fire and fuels management, Forestry, Livestock grazing, Recreation and visitor services, ACECs, WSAs, Travel management, Vegetation, Water supply, Wild horses and burros, Wildlife and fisheries
8	Sean Curtis	Modoc County Farm Bureau	Editorial, Fire and fuels management, Livestock grazing, Social and economic conditions, Vegetation
9	James Easton	Jas D. Easton Inc.	Wildlife and fisheries
10	Eric Eisenman	Pacific Gas & Electric Co.	Lands and realty
11	John and Lani Estill	Estill Ranches	Cultural and paleontological resources, Energy and minerals, Fire and fuels management, Lands and realty, Livestock grazing, Recreation and visitor services, Vegetation, VRM, Water supply, Wild horses and burros, Wildlife and fisheries
12	Steven Evans	Friends of the River	Editorial, Alternatives-general, WSRs, Public involvement / interagency coordination
13	Steven Evans	Friends of the River	Not applicable to Surprise

Commenter Number	Commenter Name	Commenter Affiliation	Comment Categories
14	Roger Farschon		Editorial, Purpose and need, Alternatives-general, Impacts-general, Air, Cultural and paleontological resources, Energy and minerals, Fire and fuels management, Forestry, Lands and realty, Livestock grazing, Recreation and visitor services, ACECs, Travel management, Vegetation
15	Bryan Griess	Transmission Agency of Northern California	Energy and minerals, Lands and realty
16	Pierre Hascheff	Bright Holland Company (landholder)	Cultural and paleontological resources, Lands and realty, Livestock grazing, ACECs, WSAs, Water supply, Public involvement / interagency coordination
17	Katherine Hill	PacifiCorp	Impacts-general, Energy and minerals, Lands and realty, Travel management, VRM, Wildlife and fisheries
18	Vicky Hoover	Sierra Club	Recreation and visitor services, ACECs, WSRs, WSAs, Travel, VRM
19	Geary Hund et al.	Wilderness Society, CA; Wilderness Coalition, CA; Wild Legacy Project, Defenders of Wildlife, NRDC	Editorial, Energy and minerals, Fire and fuels management, Lands and realty, Livestock grazing, Recreation and visitor services, ACECs, WSRs, WSAs, Travel management, VRM, Wildlife and fisheries
20	Duane James	EPA Region IX	Editorial, Air, Livestock grazing, Recreation and visitor services, Soils, Travel management, Water quality, Wildlife and fisheries
21	Donald Koch	CA Department of Fish and Game	Lands and realty, Livestock grazing, Recreation and visitor services, Vegetation, Water quality, Wild horses and burros, Wildlife and fisheries
22	Brad Kottinger	Duck Lake Ranch	Lands and realty
23	Roy Leach	NV Dept of Wildlife	Energy and minerals, Fire and fuels management, Livestock grazing, Recreation and visitor services, Soils, Travel management, Vegetation, Water quality, Water supply, Wild horses and burros, Wildlife and fisheries
24	Dan Macsay	Modoc County Board of Supervisors	Editorial, Cultural and paleontological resources, Fire and fuels management, Lands and realty, Livestock grazing, Social and economic conditions, WSAs, Travel management, Vegetation, Public involvement / interagency coordination
25	Jen Nordstrom	Western Watersheds Project	Purpose and need, Fire and fuels management, Livestock grazing, Soils, Vegetation, Water quality, Wildlife and fisheries, Public involvement / interagency coordination

Commenter Number	Commenter Name	Commenter Affiliation	Comment Categories
26	Raymond Page		Purpose and need, Alternatives-general, Air, Cultural and paleontological resources, Energy and minerals, Fire and fuels management, Forestry, Lands and realty, Livestock grazing, Recreation and visitor services, Social and economic conditions, Soils, ACECs, WSAs, Travel management, Vegetation, VRM, Wild horses and burros, Public involvement / interagency coordination
27	Vivian Parker	California Native Plant Society	Livestock grazing, Vegetation, Wildlife and fisheries
28	Bill Phillips		Editorial
29	Robert Pyle	Lassen County, Administrative Services	Alternatives-general, Lands and realty, Travel management, Vegetation, Water quality, Water supply, Wild horses and burros, Wildlife and fisheries, Public involvement / interagency coordination
30	Mark Salvo	Sagebrush Sea Campaign	Alternative-general, Livestock grazing, ACECs, Vegetation, Wildlife and fisheries
31	Sophie Sheppard		Alternatives-general, Impacts-general, Livestock grazing, Recreation and visitor services, WSAs
32	Marjorie Sill	Lassen National Forest	WSAs, Travel management
33	Stanley Sylva	Modoc National Forest	Lands and realty, WSAs, Public involvement / interagency coordination
34	Bill Whitney	Washoe County (NV), Department of Community Development	Editorial, Air, Energy and minerals, Forestry, Soils, ACECs, Travel management, Vegetation, Water quality, Water supply, Wildlife and fisheries, Public involvement / interagency coordination
35	Robert Williams	US Fish and Wildlife Service	Editorial, Alternative-general, Energy and minerals, Lands and realty, Livestock grazing, ACECs, Travel management, Vegetation, Wildlife and fisheries, Public involvement / interagency coordination
36	Bruce Warden	Lahontan RWQCB	Editorial, Livestock grazing, Water quality, Public involvement / interagency coordination

COMMENT RESPONSES

1.0 EDITORIAL

This section is divided into the following subsections:

1.1 – Editorial Changes Incorporated into PRMP / FEIS
1.2 – Editorial Changes Not Made or Made with Qualification

1.1 Editorial Changes Incorporated into PRMP / FEIS

Editorial changes were made in the document in response to the following public comments:

#12-6	#28-3	#34-7
#14-1	#28-5	#34-15
#14-11	#28-6	#35-10
#14-16	#28-7	#35-35
#14-34	#28-8	#35-38
#28-1	#28-9	#35-39
#28-2	#34-1	#36-4

These include changes to the text, maps, tables, figures, and glossary.

1.2 Editorial Changes Not Made or Made with Qualification

The following editorial comments, including comments on text, maps, tables, and figures, were reviewed but the suggested revisions were not incorporated or were made with a qualification. A summary of the comments and rationale for their final disposition is provided below.

Comment Number	Comment	Response
#8-1, #24-1	Give each chapter its own table of contents to improve readability	One comprehensive table of contents was determined to suffice.
#8-2, #24-3	Add page numbers to maps that reference text of same subject.	Because page numbers change throughout the document publication process, this suggestion was not implemented.
#8-2, #24-4	Include in tables a reference to page number of text that contains same subject	See response to previous comment.
#14-5	Ch.1, Issue Area 1: Ecosystem is not defined or used in the issue description.	Ecosystem is defined in the glossary.
#14-16	Section 2.3.3 (Leasables). First item in management common to all alternatives (“leasable mineral potential is low throughout the field area”) is not a decision but Chapter 3 statement.	Information on the potential for leasable minerals in the SFO is important for the reader to comprehend how alternatives were formulated.

Comment Number	Comment	Response
#14-7	Issue 11: Nobles Trail does not exist in SFO.	This part of the issue references extending trails (such as the Nobles Trail) into the SFO area from other areas. Scoping issues listed in Chapter 1 apply to all three northeastern California BLM field offices.
#14-25	Under 2.4.8 (Alt 2), there is no map to show polygons described in bullets 2 and 4.	No map was depicted for Alternative 2, because the polygons for AMR and full suppression are the same as the Preferred Alternative (Map FIRE-1), except that 42,239 acres within the Massacre Rim WSA would be managed as wildland fire use.
#19-126	The fire map for preferred alternative (FIRE-1) shows over half of the land managed under AMR. The map legend, colors, markings, and discussions in the text appear to be inconsistent and problems need to be resolved in final	Map FIRE-1 and the text are correct, in that the full range of AMR suppression options (from monitoring and containment to full suppression) would be employed on 328,949 acres, as shown in dark green on the map. Full suppression of wildland fires would initially be required on a total of 891,695 acres, as shown in the light green on the map. (Since the colors are overlain on a gray topographical representation, the key colors do not exactly match the map colors. However, there are only two colors in the map (other than white and gray) and two colors in the key. The more yellow colors correspond, as do the more green colors.)
#20-7	FEIS should include a map showing the watersheds and related water quality conditions of the key streams.	Map WATER-1 has been added depicting watershed boundaries and water quality and riparian functional assessments.
#24-2	Add sufficient landmarks to maps so can recognize area.	The level of detail in the maps, combined with the text, should provide description adequate for this programmatic document.
#24-18	Suggest that roads on private land that have roads on federal land connecting to them be shown on the maps.	Computerized geo-referenced data are not maintained by BLM (and likely do not exist) for roads on private lands, and therefore it would be not be possible to add them to the maps.
#28-4	Glossary, Climax Condition: does this definition allow for changes over time?	Yes.
#34-10	Section 2.21, Water Supply: include explanation of “instream” and “riparian” rights at this location or other appropriate location in the document.	These terms are defined in the glossary.
#35-3	The Table of Contents should have consistent program areas among the chapters.	These headings have been made consistent where appropriate.

Comment Number	Comment	Response
#35-11	No map that shows by category the acres proposed as open to leasing and those proposed as closed. Recommend including such a map.	Most areas proposed for closure are already depicted on ACEC, WSA, and WSR maps. All other areas would be considered open to mineral material development. Important wildlife habitats that may have addition restrictions exist at a scale to complex to map for the scope of the RMP.

2.0 PURPOSE AND NEED

Comment Number: #14-2

Comment: Section 1.2, first paragraph: The concept of supporting community needs is not well defined: does this refer to the information in the 2nd sentence about large increase in requests for land tenure decisions and for land use permits and authorizations? The existing MFPs support land tenure adjustments and ability to conduct renewable energy developments.

Response: The intent of this paragraph is meant to be general in nature; only that increased populations in the area are also increasing demands for uses on BLM administered lands. These are primarily in the form of increased recreation uses, and land tenure decisions, as stated in the paragraph.

Comment Numbers: #14-3, #14-45

Comment: Bottom rationale for doing this RMP is weak – concept of need to provide low-impact recreation is not well defined in terms of how needs constitute a change in circumstances to require entirely new RMP. Vegetation concerns also seem to be handled under current management regime without a new RMP. (Sec 1.2) Purpose and need fail to demonstrate need for new RMP.

Response: BLM is required to periodically review each RMP providing the management approach for lands under the agency's care. As stated in the Draft RMP EIS, new information, changed circumstances, and changed resource conditions since development of the original 10 plans or amendments for Surprise require development of a new consolidated and updated Resource Management Plan.

Comment Numbers: #25-3, #25-4, 25-5

Comment: Maintaining and improving wildlife habitat and restoring degraded range conditions should be reflected in the purpose and need in compliance with Taylor Grazing Act of 1934, FLPMA of 1976, and other laws governing livestock management. This direction, based on laws and regulations, should be explicitly stated in P&N. Selection of any alternative that does not provide direction for meeting those goals violates intent of laws and regulations governing public land management. Correction of resource degradation caused by domestic livestock and prevention of future degradation should be driving force behind RMP and reflected in NEPA document and future agency decisions regarding livestock grazing.

Response: The purpose and need for the RMP is to provide overall management and long-term direction for the public lands and resources administered by BLM's Surprise Field Office, in accordance with FLPMA, as stated in Section 1.1. The legislative, regulatory, and policy direction — which guided the development of the management alternatives for each resource — is clearly stated in each resource-specific subsection of Chapter 2 (which now includes reference to the Taylor Grazing Act for livestock management).

Comment Number: #26-5

Comment: Purpose and Need – does impact analysis really cover 15-20 years? What is meant by new information, changed circumstances, and resource conditions"?

Response: The intent of the RMP is to address potential impacts over a period of up to 15-20 years. The capability of BLM to achieve the objectives of the RMP depends on many factors, including the annual Federal budget, personnel resource allocations, shifting agency priorities over time, and the response of natural systems to the management approaches that are implemented. We recognize that this RMP will be replaced by another plan within 10 to 20 years, yet much of the plan's focus remains long term, since only in the long term can we attain many of the plan's key objectives. Should any of the actions or requirements within the RMP act as an unforeseen limitation to desired future actions, BLM could amend the RMP to address that issue, if required.

As pointed out in the Draft RMP/EIS, new information, changed circumstances, and changed resource conditions since development of the original 10 plans or amendments for Surprise require development of a new consolidated and updated RMP. These changed circumstances and conditions, such as an increase in recreation demand and use and an increase in the number of special status ecological species, as described in Section 1.2, can result in conflicts between existing uses and resource concerns that the old land use plans were not designed to address. This updated RMP identifies and addresses planning issues relating to existing and potential land and resource allocations; levels of resource use, production, and protection; and related management practices, including those relating to livestock. These issues, identified during the scoping process and listed in Section 1.5, were derived from what BLM managers, the public, industry, other Federal agencies, State and local governments and Indian tribes see as concerns, problems, or needs, and form the basis of purpose and need for this RMP.

Comment Number: #26-6

Comment: Section 1.2: Local BLM has greater responsibility to local economy and local people (compared to people from other areas) than it seems to indicate in document. Collaboration and coordination with permittees is imperative if progress is to be made toward many of the stated desired conditions in proposed plan.

Response: We agree that collaboration and coordination with permittees is important in meeting many of the desired conditions stated in the proposed plan. Our proposed action recognizes this need and we have included numerous statements/commitments to this effect in the PRMP / FEIS. For example, Guideline 16 in the Standards for Rangeland Health and Guidelines for Livestock Grazing Management (see Appendix B) requires that all options for allotments not meeting or making significant progress toward meeting the standards be determined in "full coordination, consultation, and cooperation with permittees." In addition, we would work with permittees in determining, on a site-specific basis, the need for additional protection measures (such as exclosures) that could affect livestock and / or place an added burden on livestock operators.

3.0 ALTERNATIVES – GENERAL

This section summarizes and addresses comments on the alternatives that are not specific to a particular program area (program area-specific comments are addressed in the subsequent sections). Only those comments considered very general in nature are included here.

Comment Numbers: #7-1, #12-2, #30-1

> **Comment:** These comments expressed a general preference for all or part of Alternative 2 over the preferred alternative, and several recommended further modification of Alternative 2 to provide more protection of wildlife, habitat, wild and scenic rivers, soils, water quality, and other natural values.
>
> **Response**: BLM appreciates the importance of environmental protection and acknowledges the challenges of balancing environmental protection with site access for public use. We believe that the preferred alternative, with some additional modifications as identified in Section 1.11, best balances environmental protection and site access in accordance with Section 302(a) of FLPMA, which requires the Secretary to manage BLM lands under the principles of multiple use and sustained yield, and the other planning criteria that are described in Section 1.6.

Comment Numbers: #14-8, #14-10, #14-47

> **Comment:** Range of alternatives is weak and difference between them often unclear, especially Alternatives 1 and 3. Alternatives do not meet reasonable range of alternatives as required by CEQ regulations. A no grazing alternative should have been considered. Not considering a no livestock grazing alternative is a violation of CEQ regulations to consider all reasonable alternatives.
>
> **Response**: We believe that the alternatives identified and evaluated in the Draft EIS were clear and consistent with CEQ NEPA regulations by providing a reasonable range of management alternatives from which to make our decision. The five alternatives ranged from a maximum resource use scenario (Alternative 1) to a maximum resource protection scenario (Alternative 2), with the other three alternatives (traditional, preferred, no action) falling in between. In accordance with NEPA, these alternatives included a reasonable range that addressed identified planning issues and management concerns – while exploring a range of use options, protection options, and management tools that would achieve a balance between protection of the management area's natural character, and a variety of resource uses and management issues. Alternative 2 is consistent with a minimum grazing scenario (in fact, several other commenters referred to this alternative as an "essentially no graze" proposal). Alternatives 3 emphasized traditional community uses of resources and / or emphasis on historical uses. We consider it a distinct alternative in terms of overall approach and strategy when all resource areas are taken into account. However, we acknowledge that for many individual resource management areas, Alternative 3 was found to be similar to either Alternative 1 or the no action alternative (current management strategy).

Comment Number: #14-9

> **Comment**: In many cases, the no action alternative incorrectly describes the MFPs.

Response: We feel that the Draft and Proposed RMPs accurately reflect current management under the No Action Alternative.

Comment Numbers: #14-12, #14-46

Comment: RMP alternatives, with few exceptions, fail to comply with BLM Planning Handbook Appendix C requirements and, where they do, it is not clear what are RMP decisions and what are implementation decisions. Alternatives do not follow requirements of BLM Planning Handbook

Response: Appendix C of the BLM Planning Handbook H-1601-1, 2005 provides guidelines for developing alternative management actions within the RMP. We believe that BLM has used a thorough process for developing an adequate range of alternatives for all resource subjects. The only implementation decisions within the RMP are those related to Travel Management: "Complete a defined travel management network (system of areas, roads and/or trails) during the development of the land use plant to the extent practical." (Land Use Planning Handbook, H-1610-1, Appendix C.2.D)

Comment Number: #14-13

Comment: Virtually none of the objectives meet the requirements of S.M.A.R.T. (Specific, Measurable, Achievable, Results-focused, Timely) which is the standard measure for good objectives.

Response: The objectives listed in Chapter 2 were developed to be as specific as possible for the level of management actions that can be prescribed at the land use plan level. As implementation decisions are made, according to direction from this PRMP, these projects will require a site-specific NEPA analysis, which will refine objectives at that time, on a site-specific level.

Comment Numbers: #26-1, #26-3

Comment: Eliminate majority of use of the term "all" in final document….seldom are there actions without exceptions. BLM should be more cautions when putting limitations on its management. Upper, self-imposed limits on acreage (e.g., use of ALL and NO NEW) will most likely come back to haunt BLM.

Response: BLM has reviewed the use of the term "all" in the PRMP and find it to be accurate.

Comment Number: #29-2

Comment: Draft RMPs reflect differences and inconsistencies between the three field offices.

Response: BLM acknowledges that the three RMPs contain differences. These reflect field office-specific issues, and also are reflective of authorship by different field office-specific resource specialists. However, each RMP follows BLM's guidelines for resource management planning. Editorial improvements to the PRMPs / FEISs may address some of the specific differences that prompted this comment.

Comment Number: #31-1

Comment: Find actual content and range of alternatives to be rather limited. In addition, the analysis for each resource area rarely presents five alternatives.

Response: The five management alternatives identified and analyzed in the Draft RMP were developed using input and comments from public scoping meetings, written comments, as well as ideas from staffs of BLM and other cooperating agency partners. In accordance with NEPA, these alternatives formed a reasonable range that address identified planning issues and management concerns – exploring a range of use options, protection options, and management tools that would achieve a balance between protection of the management area's natural character, and a variety of resource uses and management issues. We believe that each alternative has been sufficiently evaluated in the PRMP / FEIS and is consistent with resource goals and objectives, current laws, regulations, and policy. Note that in many instances, the management actions for a given resource area were identical across more than one alternative, and so it was not necessary to repeat the description of the impact analysis for each alternative. As noted in the PRMP / FEIS, the alternatives other than the Preferred Alternative (and their corresponding analyses) have not been re-printed in the PRMP / FEIS as they have not changed. However, the Impacts Summary Table at the end of Chapter 2 provides a detailed comparison and clear differentiation of the impacts on each resource from each of the five alternatives.

Comment Number: #35-8

Comment: With regard to those lands that lie adjacent to Sheldon NWR, request that BLM not include any proposed actions in the RMP/EIS that would compromise the purpose for which the refuge was established.

Response: BLM is not proposing any management actions that would compromise the purpose for which the Sheldon NWR was established.

4.0 IMPACTS (GENERAL)

Comment Number: #14-44, #31-8

Comment: The cumulative impact section does not even attempt to comply with BLM, CEQ or legal precedent requirements for adequacy. The failing of the cumulative analysis put the entire NEPA analysis in a position to legal challenge. There are three NORCAL BLM RMPs being considered at the same time but this section fails to even mention the other two RMP/EISs.

Response: We believe the cumulative impacts section to be adequate, particularly in regards to the small amount of significant adverse impacts expected from implementing RMP decisions under the preferred alternative.

Comment Number: #14-48

Comment: The NEPA analysis is seriously flawed and is not consistent with BLM or CEQ requirements.

Response: We believe that the alternatives identified and evaluated in the Draft EIS were clear and consistent with CEQ NEPA regulations by providing a reasonable range of management alternatives from which to make our decision. The five alternatives ranged from a maximum resource use scenario (Alternative 1) to a maximum resource protection scenario (Alternative 2), with the other three alternatives (traditional, preferred, no action) falling in between. In accordance with NEPA, these alternatives included a reasonable range that addressed identified planning issues and management concerns – while exploring a range of use options, protection options, and management tools that would achieve a balance between protection of the management area's natural character, and a variety of resource uses and management issues.

In addition, Chapter 4, Environmental Consequences, provides a very in-depth analysis of both adverse and beneficial impacts that would result from implementing proposed management actions under each alternative. Due to the general nature of some land use plan decisions, a quantitative evaluation of the impacts is not always possible. Impact intensity criteria are described for each resource in order to analyze the intensity of effects on the specific resource or land use and for a comparison of the degree of effects between alternatives.
Each resource section begins by discussing the methodology used for the analysis of environmental consequences and the basic assumptions that were used to support the impacts analysis. Incomplete or unavailable information is also documented as applicable. The Impacts Summary Table at the end of Chapter 2 provides a detailed summary of impacts between alternatives.

Comment Number: #17-2

Comment: Many federal land management agencies, including BLM and the Forest Service, have issued policy statements in regard to sustainable development concepts, which includes provision for renewable energy resources. Commenter urges BLM to use the principles and terminology contained in the joint federal agency explanation of this concept, Sustainable Development and its Influence on Mining Operations on Federal Lands (April 2002) when evaluating alternatives.

Response: The PRMP has been revised to include Section 2.3.6 related to renewable energy. Relevant to the proposed management actions in SFO's RMP, the referenced document states that decisions about exploration, extraction, and mine closure require consideration of three important components of sustainable development: social equity, environmental health, and economic prosperity. We believe that the programmatic decisions in this RMP, as well as our process for site- and project-specific decisions on these activities, adequately encompass consideration of these components.

5.0 AIR QUALITY

Comment Number: #14-14

Comment: Goals and objectives attempt to meet RMP requirement of identifying desired outcomes but narrative in 2.1.5 (air quality) is at best policy or poorly described implementation decisions.

Response: The proposed management actions in Section 2.1.5 have been revised to address the activities that within BLM's control that could affect air quality. As stated in Section 2.1, of the six criteria pollutants included in the national ambient air quality standards, the air pollutant of most concern on BLM-administered land is particulate matter, which may originate from fire, road, or windblown dust, and vehicle use. The majority of this particulate matter is produced from fire. Land managers have little control over where, when, and how much smoke is put into the air during wildland fires. The management actions available to them to manage smoke levels are mainly limited to prescribed fire. Therefore, the discussion in Chapter 2.1.5 is similarly limited to such actions, which include the number of acres identified for prescribed burning; and development of a prescribed fire burn plan to ensure that appropriate weather conditions, firing methods, and mop-up standards are implemented to minimize emissions.

Comment Number: #20-10

Comment: FEIS should include additional information regarding the measures that will be used to reduce air impacts from project activities such as mechanical treatments, mineral activities, and OHV use.

Response: As stated in Chapter 4.1.1, fugitive dust from vehicle travel usually settles quickly and remains relatively close to the point of origin, resulting in only localized effects. Other sources of emissions (emissions from vehicles, minerals exploration, and mechanical treatments) generally would be localized and short-lasting. Because these emissions are expected to be minor and short-term in nature, no additional measures are identified to reduce air impacts from these types of project activities.

Comment Number: #26-8

Comment: Air quality is important, but limiting prescribed burning to less than 0.5% of the resource area per year would appear to place an unworkable cap on management. Need more flexibility to deal with such things as yearly budgets & weather conditions. Evidence appears to show that most of current man-made air pollution in area comes from the California Central Valley and I-5 corridor. Should controlled burns really be capped at 5000 acres per calendar year?

Response: Based on our past experience in managing the SFO planning area and best professional judgment, we believe that the proposed 5000 acres is a reasonable and realistic upper limit. We also believe that it offers an optimal balance between resource benefits and resource degradation. Note that this acreage is the maximum amount identified among the alternatives, and that wildland fire also would be used to protect, maintain, and enhance resources and, as far as possible, be allowed to function in its natural ecological role.

Comment Number: #34-2

Comment: Include text about coordinating prescribed fire projects with adjacent BLM field offices due to potential "down-wind" impacts on special events on public lands.

Response: Prior to conducting any prescribed fire projects, BLM would prepare a project-level review (environmental assessment) that would analyze site-specific impacts (including impacts to areas down wind). Such projects would be coordinated with all potentially affected parties, including adjacent or nearby landowners, prior to implementation. Any prescribed fire project also would be carefully timed and managed in such a manner that Federal (CAA), state, and local standards for particulate matter (PM_{10}) are not exceeded. Smoke management plans would continue to be written and implemented for all prescribed fires, and would include information and techniques used to reduce or alter smoke emission levels. Site-specific information would also be used to assist fire managers in determining what weather conditions, firing methods, and mop-up standards should be used to minimize impacts.

6.0 CULTURAL RESOURCES AND PALEONTOLOGY

Comment Number: #1-3

Comment: Add a statement of support for site stewards to monitor endangered cultural resources.

Response: The use of site stewards to monitor special cultural resources is a good suggestion and one, in fact, that BLM has tried in the past. We have added a general statement at the end of Section 2.2.3 regarding the need to promote and enhance public education, outreach, and stewardship programs. Hopefully we will have better success with such a program than in past years, where we have found it difficult to recruit site stewards due to our location far from urban areas. Individuals that have taken our formal site stewardship training program in the past work in the Black Rock/High Rock NCA.

Comment Number: #1-4

Comment: Because of SHPO protocol, include a reference in the text to coordinating on public education for Archaeological Awareness Week/Historic Preservation Month.

Response: Reference to public education has been added to Section 2.2.5.

Comment Number: #1-5

Comment: Will BLM actively consult with Native Americans to determine locations of harvesting/gathering areas prior to vegetation manipulation to improve ecosystems (p. 2-77 and 2-78)?

Response: Yes. A statement to this effect has been added to Section 2.15 (Vegetation).

Comment Number: #1-6

Comment: Regarding maintenance of current cultural resource inventory in GIS format, SHPO suggests including a recommendation to share the data with CA and NV SHPOs in keeping with protocol BLM shares with SHPO.

Response: This recommendation has been added to Section 2.2.3.

Comment Number: #1-7

Comment: Strongly supports designation of Massacre Bench and Bitner Ranch as ACECs. Do not know about North Hays Range cultural resources but support establishment of Duck Flat CRMA; also support interpretation of Bitner Ranch, Rock Creek, and the Lassen-Applegate Trail.

Response: Thank you for your support of these areas that would be designated as ACECs and CRMAs under the preferred alternative.

Comment Number: #1-8

Comment: Page 3-21 describes two factors that affect integrity of cultural resources: overgrazing and reduction of vegetation and vandalism. However, environmental consequences for preferred alternative (page 4-17) suggest OHV use would continue to be unregulated and continue to disturb cultural resources.

Response: We believe that the text on page 4-17, as currently written, clearly states that designation of these areas as ACECs and CRMAs would protect cultural resources from illegal OHV access through area closure and limitations to OHV use.

Comment Number: #1-9

Comment: Effects of grazing would continue and livestock use potentially increase. Wouldn't it be appropriate here (Potential Effects on Cultural and Paleontological Resources, p. 4-17) or in Chapter 2 to reference conformance with the state protocol regarding identifying and treating properties affected by grazing?

Response: Reference to conformance with the National Historic Preservation Act, Federal regulations, and the California and Nevada state protocols for identifying and treating properties affected by grazing has been added to Ch 2.2.3 in response to this comment.

Comment Number: #1-10

Comment: Shouldn't BLM describe measures to be taken to curtail illegal activities that pose threat to cultural resources? "Implementing regular law enforcement patrols as feasible" does not seem like much of a commitment (page 2-12).

Response: The SFO PRMP/FEIS has been revised to clarify that law enforcement patrols would also be conducted to assist in preventing vandalism. In addition, we have added a statement regarding the promotion and enhancement of public education (Section 2.2.5), which we believe will also help reduce the threats to cultural resources from illegal activities.

Comment Number: #11-4

Comment: Commenter opposes establishing the Tuledad/Duck flat CRMA which will include a small portion of the southwestern part of the Bare Allotment and approximately the east half of the Tuledad Allotment; urges adoption of Alternatives 1 or 3 on this point.

Response: We appreciate the comment and note the commenter's concern regarding potential effects of CRMA designation on his particular piece of property and permitted grazing activities. We would like to point out that the proposed CRMA designation under the preferred alternative would not affect livestock grazing activities on the commenter's property. CRMP plans will not directly affect grazing permittees. Projects would be coordinated with interested publics on site-specific level. Therefore, there should be no difference between the alternatives with respect to impacts on livestock grazing for this permittee / commenter.

Comment Number: #14-15

Comment: Section 2.2 fails to identify special cultural resource restrictions that may affect the location, timing, or method of development or use of other resources in the planning area. Description fails to disclose that the Cowhead/Massacre MFP had several of these restrictions including those related to grazing in the North Hays Canyon Range and the Massacre Lakes cultural areas.

Response: Chapter 2 has been revised to reflect the cultural resource restrictions currently in place in the planning area as well as BLM's intentions / commitment to acquire private lands when possible and update the management plans for these areas (CRMPs). See the revised Alternatives Summary (at the end of Chapter 2) for the no action alternative under cultural resources. Note that the revised text has been included in the alternatives summary table, since the descriptions of alternatives other than the preferred alternative were not been reprinted in the PRMP / FEIS.

Comment Number: #16-3

Comment: The Preferred Alternative states that the designation of two cultural resources management areas (including the Duck Flat CRMA) would offer a proactive approach to managing cultural resources (p. 4-17), but it provides no information on how this management could affect neighboring private lands. The Companies are concerned that rights-of-way needed for surface access, pipeline and utility corridors both on public and private lands through the proposed CRMA may be prohibited by the subsequent cultural resource management plan to be prepared for the CRMA. The restrictions placed on public land for the CRMA may limit existing or future uses on the neighboring Companies properties or they may impede access or utility rights of way through the CRMA to or from these private properties. Companies are concerned BLM may be taking the position through this planning document that it will not issue rights of ways in Wilderness Areas and/or ACEC areas. The right to obtain right of way permits should be included by express authority in the planning document. We request BLM expressly provide in the RMP for ingress and egress and pipeline and utility corridors through the CRMA, ACEC, and WSAs without additional restriction.

Response: BLM has no authority on private lands and the rights of private landowners would continue regardless of adjacent land use designations. Owners of private land surrounded by public land (managed under the FLPMA) would be granted access across public land to permit reasonable use of their property. A CRMA is a BLM discretionary designation that describes only an area of management emphasis. However, any new rights-of-way proposals would be subject to a site-specific NEPA review, regardless of the CRMA designation.

Comment Number: #24-9, #26-10

Comment: CRMP development should include the grazing permittees. Most CRMPs (2.2.5, page 2-11) should include the permittees; the 180,000 acres involved represent about 15% of the SFO area and 14% of the proposed number of livestock AUMs. Past experiences of government actions (Sheldon Refuge and recent NCA) have greatly reduced the livestock business, the economic mainstay in our community. Permittees must be included with staff interdisciplinary teams. Possibility of exchanges or archaeological sites or other mutually beneficial arrangements may exist with consultation on this mater.

Response: CRMP plans will not directly affect grazing permittees. Projects would be coordinated with interested publics at a site-specific level. The management plan (CRMP) that will be created for the CRMAs will address items such as research opportunities, public interpretation, archaeological inventories, law enforcement patrols to curb vandalism, public education and interpretation, site monitoring, and the development of site stewardship programs. The plans will address archaeological sites located only on public lands. Decisions regarding livestock grazing will not be a part of these plans. Any projects resulting from plan decisions that have the potential to impact any resources will be addressed through proper NEPA documentation and consultation with potentially affected parties.

Comment Number: #26-9

Comment: Appears that most recent human culture in Surprise Area has been left out of document, i.e., the European settlement that began here over 145 years ago. Some feel that BLM planning has overlooked its responsibility to preserve our present and past history, culture, and customs (e.g., mysterious burning of Badger Bunk House and the Conlon Camp Cabin).

Response: Thank you for your comment. With the exception of the text items relating to historic trails, we have completely revised Section 3.2.4 (Historic Context) in the PRMP / FEIS to include additional detail on the area's recent history.

7.0 ENERGY AND MINERALS

This section is divided into the following subsections:

7.1 – New Energy Development
7.2 – Energy and Minerals Development Restrictions
7.3 – General

7.1 New Energy Development

Comment Number: #15-1

Comment: Urges BLM to continue and expand support for and recognition of need to develop renewable energy resources (wind and geothermal).

Response: We agree with the comment and have included a discussion on wind energy in the PRMP / FEIS that addresses how wind energy projects will be designated and developed in accordance with the 2005 Final PEIS on *Wind Energy Development on BLM-Administered Lands in the Western United States* (see Section 2.3.6).

Comment Number: #17-1

Comment: As a general matter, commenter believes that the EIS and RMP should better emphasize and promote issues related to electrical energy development. Document currently appears to under-emphasize the energy development needs of electrical generation and transmission.

Response: The PRMP / FEIS discussions have been expanded to address potential wind energy development (Section 2.3.6) and recognize the potential need for additional corridor development, including designation of the potential California-Nevada (east-west) corridor as an additional right-of-way corridor to promote energy resource development in the SFO management area (see revised Section 2.7.2). See also responses to comments in Lands and Realty section of this appendix.

Comment Numbers: #23-4, #23-18, #23-39

Comment: No reference to wind energy FEIS/ROD that amends this land use plan for land use practices outside of the previous MFP III Decisions. No management actions or mitigation measures are found in either planning efforts; areas of avoidance or exclusion were not found. Wind energy is not adequately assessed. In respect to recent nationwide PEIS, the RMP must address the impacts and mitigation. Draft RMP avoids the issues and does not designate areas of avoidance or exclusion. Wind energy and transmission corridor EISs have an influence on this land use plan. It is unclear how these major projects are integrated into the RMP.

Response: Section 2.3.6 has been revised to indicate how wind energy projects will be designed and developed in accordance with the 2005 Final Programmatic EIS on Wind Energy Development on BLM-Administered Lands in the Western U.S. Section 2.7.2 has been revised to reference the ongoing east-west transmission corridor study (*West-Wide Energy Corridor Programmatic EIS, 2005*) and discuss BLM's involvement as a cooperating agency and specific role in any related (future) corridor development.

Comment Number: #35-1

Comment: RMP does not provide comprehensive discussion of renewable energy development in terms of what lands would be open to this type of development, maps showing what areas are open to such development and any constraints that would be placed on this type of development. If such development would be permitted under the preferred alternative, its impacts should be analyzed in Chapter 4. Also regarding wind energy development, BLM should adhere to USFWS guidance for wind energy development when permitting any future projects [identifies recommended guidance to be integrated into future wind energy developments].

Response: Wind energy projects will be designed and developed in accordance with the 2005 Final Programmatic EIS on Wind Energy Development on BLM-Administered Lands in the Western U.S. Implementation of any proposed management actions would ensure that potential adverse impacts to most of the natural resources present at wind energy development sites would be minimal to negligible; see revised Section 2.3. Effects of site-specific renewable energy development projects will be comprehensively addressed in separate NEPA documentation at the project level. Adverse impacts to wildlife and their habitats will be avoided or minimized by following the U.S. Fish and Wildlife Service's *Interim Guidelines To Avoid And Minimize Wildlife Impacts From Wind Turbines*, 2003.

7.2 Energy and Minerals Development Restrictions

Comment Numbers: #7-17, #7-22

Comments: Allow less mineral extraction / leasing and more "no surface occupancy" restrictions. Oppose non-essential rock removal and ask for fewer acres to be open to sand, cinder, gravel extraction.

Response: We believe that the preferred alternative includes the most appropriate mix of management measures to adequately protect the unique and sensitive resources found in the SFO planning area from minerals development, while also considering the relative significance of the public land products, services, and use to local economies. These measures, as described in Sections 2.3, 3.4, and Appendix D of the PRMP / FEIS, include closure, no surface occupancy restrictions, or other types of restrictions (such as seasonal restrictions).

Specific minerals or energy project proposals will be considered on a project-specific basis in accordance with FLPMA, regulations, and BLM policy. This would include conducting site-specific botanical/ecological and archaeological evaluations, as well as a separate environmental review of each proposal prior to development to evaluate (and minimize) potential site-specific impacts. Additional restriction stipulations would be applied as needed and appropriate.

Comment Number: #11-8

Comment: Commenter does not oppose preferred alternative relative to leasable minerals, as long as the "Prospective Oil and Gas Land" and the "Prospective Geothermal Land" development in Map MIN-1 is compatible with the authorized livestock use.

Response: Specific minerals or energy project proposals will be considered on a project-specific basis in accordance with FLPMA, regulations, and BLM policy, including this RMP, which balances multiple land uses, including livestock grazing. Note also that the potential for oil and gas development is very low to none; active oil and gas exploration or production is not expected to occur in the SFO area in the future. In addition, BLM generally finds energy development activities to be compatible with grazing.

Comment Number: #14-20

Comment: WSAs are closed to saleable minerals, so what areas and how many acres are open? Appendix C requirement to identify terms and conditions or special considerations is not met.

Response: The area or acres open to minerals development was identified in the Alternatives Summary Table in the Draft RMP EIS; this information remains in this table in the PRMP / FEIS, under Energy and Minerals section and broken out by leasable, locatable, and saleable minerals. Section 2.3.3 of the PRMP / FEIS has also been revised to include these open acreages within the text.

Comment Number: #19-121

Comment: RMPs should incorporate BMPs for oil and gas development activities, and make them mandatory, especially in sensitive areas. Commenter specifies BMPs to include.

Response: Potential for commercially viable oil and gas deposits is low throughout the management area. There are no existing oil and gas leases in the field office area, and active oil and gas exploration or production is not expected to occur in the SFO area in the future. Further interest in oil and gas leasing is not expected unless technological advances reduce the cost and financial risk of exploring beneath the volcanic overlay. However, if oil and gas development were to take place in the future, BMPs would be prescribed and implemented based upon project-specific and site-specific conditions and requirements, including those necessary to protect sensitive resources from oil and gas development. Once implemented, BMPs would be monitored, evaluated, and modified as necessary through an iterative process to ensure the protection of sensitive resources and compliance with other resource management objectives.

Comment Number: #26-11

Comment: Consideration of livestock operations was left out of objective for minerals

Response: Given that the potential for new energy and minerals development is very low in the SFO planning area (other than some minerals development around existing mines), and the fact that energy and minerals development is generally considered to be compatible with livestock grazing, grazing (which is considered to be included in "other resource values") was not considered to warrant specific mention.

Comment Number: #34-3

Comment: Recommend moving protection of sage grouse leks from "seasonal restriction" to a "closed" category (page 2-16).

Response: The potential impacts to sage grouse from energy and minerals development has been evaluated and BLM believes that the proposed management actions in the PRMP / FEIS, which include seasonal restrictions, offer adequate protection. Furthermore, as noted in responses to comments above, specific minerals or energy project proposals will be considered on a project-specific basis in accordance with FLPMA, regulations, and BLM policy. This would include conducting a separate environmental review of each proposal prior to development to evaluate (and minimize or avoid) potential site-specific impacts on sensitive resources. Additional restriction stipulations would be applied as needed and appropriate. We are confident that our management approach under the proposed action for sage grouse and sagebrush ecosystems will provide them with an effective level of protection in the SFO planning area.

Comment Numbers: #35-9, #35-12

Comment: Having 85% of SFO lands open to fluid mineral leasing, and 100% of SFO lands open to locatable mineral development, conflicts with conserving fish and wildlife resources. Suggest BLM reconsider allowing this many acres to be open. Recommend BLM also consider closing certain areas (5 areas specified in comment).

Response: We believe that the preferred alternative includes the most appropriate mix of management measures to adequately protect the unique and sensitive resources found in the SFO planning area from minerals development, while also considering the relative significance of the public land products, services, and use to local economies. These measures, as described in Sections 2.3, 3.4, and Appendix D of the PRMP / FEIS, include closure, no surface occupancy restrictions, or other types of restrictions (such as seasonal restrictions). Note that the potential for discovering commercially viable oil, natural gas, or geothermal energy reserves is low to non-existent throughout the planning area, and locatable mineral activity is expected to be limited in and around existing claims.

Specific minerals or energy project proposals will be considered on a project-specific basis in accordance with FLPMA, regulations, and BLM policy. This would include conducting site-specific botanical/ecological and archaeological evaluations, as well as a separate environmental review of each proposal prior to development to evaluate (and minimize) potential site-specific impacts on sensitive species (see also Chapter 4, Wildlife) Additional restriction stipulations would be applied as needed and appropriate.

7.3 General

Comment Number: #6-5

Comment: Agrees that NEPA would need to be followed for location-specific energy projects.

Response: We appreciate your support for the need to conduct separate site-specific NEPA reviews on energy projects in response to specific energy proposals.

Comment Number: #14-17

Comment: The Section 2.3.3.3 discussion of management common to all alternatives (except for first sentence) contains standard operating procedures, not RMP or implementation decisions.

Response: Chapter 2 (Section 2.3) has been revised to more appropriately identify proposed management actions and decisions commensurate with an RMP.

Comment Number: #14-18

Comment: The description of the No Action alternative under Leasable Minerals is the first place the existing land use plans are clearly and concisely described.

Response: Thank you for your comment.

Comment Number: #14-19

Comment: The 2nd paragraph in the description of all the other alternatives (besides no action) essentially negates the RMP level decisions contained in the first paragraph of each alternative by saying the RMP decisions we made above are subject to change. This is not consistent with the requirements of Appendix C. It makes the potential RMP decisions meaningless.

Response: Acreages identified in each alternative are based on current, known data. As new projects are proposed and specific geographic NEPA analysis is conducted it is anticipated that site specific knowledge and actual acreage location will be modified. In developing the Surprise PRMP/FEIS, BLM used the best science currently available, collaborated with other government agencies, and involved the public extensively. However, BLM's knowledge of resource conditions continues to evolve as local environmental conditions change, as new management techniques are developed and used, and as advances in science and technology are made available. Therefore, it is inevitable that in the future, some of the management direction in this PRMP/FEIS will be found to be erroneous, or inadequate, and need to be revised. To address this, implementation of the Surprise PRMP/FEIS will use an adaptive management approach to modify management actions and to incorporate new knowledge into our resource management decisions. The Chapter 2 introduction has been revised to describe the adaptive management process that BLM would follow for the RMP.

Comment Number: #14-41

Comment: It appears that minerals designations and the ACEC descriptions do not match.

Response: This inconsistency was actually corrected in the errata sheet that came out after issuance of the Draft RMP. The PRMP / FEIS has undergone a thorough review to ensure that acreages relative to minerals and ACECs are consistent.

Comment Number: #17-10

Comment: References to the National Energy policy should be updated to reflect the most current National Energy Policy Act signed in 2005 (Sections 2.3.2 and 4.3.3).

Response: The PRMP / FEIS has been revised to reference the updated energy policy. Thank you for your comment.

Comment Numbers: #19-95, #26-13, #26-14

Comment: BLM should carry forward the management prescriptions for Energy and Minerals described in the preferred alternative. Preferred alternative sounds good regarding locatable and saleable minerals.

Response: Thank you for your support of the preferred alternative.

8.0 FIRE AND FUELS MANAGEMENT

Comment Numbers: #7-13

Comment: Fire management goal should be to return to natural fire regime, i.e., avoid too much fire suppression (e.g., use only near or within wildland urban interface zones). Retardants and fuel break clearing should be avoided.

Response: As stated in the PRMP / FEIS, fire would be used as much as possible to achieve resource management objectives, since fire is the most natural and cost-effective means of restoring, improving, and maintaining ecosystems. Wildland fire would be used to protect, maintain, and enhance resources and, as far as possible, be allowed to function in its natural ecological role. However, fire suppression is sometimes necessary for safety reasons and to protect special resource values. Fire management would have a range of appropriate tools available for use. An appropriate management response (AMR) would be determined for every wildland fire (with public and firefighter safety as first consideration). Further prioritization would be based on the relative value of resources and structures requiring protection, and the cost of providing that protection. AMR encompasses the entire spectrum of tactical options from basic monitoring to aggressive and extensive suppression. The AMR for a particular area would use objectives and strategies identified in the NorCal Fire Management Plan. When fire intensity is severe (as defined in the NorCal Fire Management Plan), aggressive attack and full suppression are the appropriate management response – especially in the wildland urban interface. However, exceptions would apply where resource objectives could be achieved and the fire safely contained.

Comment Numbers: #7-15, #19-127

Comment: Other tree removal should focus on smallest trees (most flammable) and leave mature trees. Large diameter trees are the most resistant to fire while small trees, especially those clustered in post-clearcutting thickets, are the most vulnerable. Therefore, very disturbed to find that the Preferred Alternative proposes to target “over-mature” trees to reduce fire danger (page 2-36). USFS in CA has stopped using this outdated term and acknowledges that forests dominated by large, mature trees are most resistant to fire.

Response: In general we are trying to do this as our timbering approach provides for protection of old growth and late succession forests. We have deleted the reference to “over mature forest” in Section 2.6.5 of the PRMP / FEIS.

Comment Number: #8-4

Comment: Consider formation of regional seed bank rather than local to make sure sufficient native seed supplies are available to reseed burned areas.

Response: We agree that regional native seed banks would be very useful for re-seeding efforts and would create a locally gathered native seed cache to facilitate seeding projects. We will also continue efforts to identify other existing banks in the region; we are currently aware of a regional seed bank (BLM warehouse) in Boise, ID and Bend, OR. In general, locally gathered, native seed and/or plants will usually be used for seeding and planting areas burned by wild or prescribed fire, juniper treatment areas, and other disturbed areas. However, non-local native seed may be used when local seed is unavailable. For some uses, under certain circumstances, non-native seed or plants may also be employed.

Comment Number: #8-5

Comment: Develop pre-fire agreements to use certain non-native seed if sufficient native seed not available.

Response: As described in Section 2.15.5, seeding for emergency stabilization and rehabilitation following wildfires, rangeland improvement projects, or efforts to enhance livestock forage would be conducted with a suitable mixture of seed from locally evolved native forbs and grasses and desirable non-local and introduced species. The precise mixture would be determined on a site-specific basis in accordance with existing BLM policy (California Native Seed Policy). It would consider the probability of success, risks associated with failure, and other considerations.

Comment Number: #11-5

Comment: Estill does not oppose fire management preferred alternative.

Response: Thank you for your comment.

Comment Number: #11-6

Comment: Estill does not oppose forestry and fuels management preferred alternatives, but encourages planners to recognize livestock grazing as an important tool to remove excess forage while producing a viable product (beef and lamb) which benefits local and national economies. For purpose of fire prevention, livestock grazing should be increased via Temporary Non-Renewable (TNR) increases in authorized grazing whenever we have an above average year in terms of rainfall and forage production.

Response: We believe that the preferred alternative includes the most appropriate mix of fuels management measures, including grazing (biological treatments), to adequately meet human safety needs and achieve resource objectives of the SFO. Hazardous fuels reduction plans will be developed in coordination with resource specialists, and will identify the appropriate treatment method for a specific site.

Comment Numbers: #14-21, #14-22, #14-23

Comment: Under Fire Management, the goals section is a mix of goal and decision. For wildland fire management, the first sentence is close to a goal, but the 2nd sentence describes an action. Under Fire Management, for goals related to risk mitigation and education, first sentence is close to a goal statement, second sentence describes actions and third sentence is a kind of rationale for the first sentence. Under objectives for fire management, both sections are mix of "kinda" objectives and management actions. Last paragraph of wildlife fire management section seems backwards – RMP is supposed to provide guidance to fire managment plan, not the other way around.

Response: Thank you for your comment. We believe the context of our goals and objectives for Fire Management to be correct. BLM has revised this section of the RMP (Section 2.4) to clarify the relationship between the NorCal Fire Management Plan and the Surprise RMP decisions, as follows: "The current NorCal FMP would be updated upon signature and approval of the Proposed Surprise RMP to reflect management actions within the Proposed RMP."

Comment Numbers: #14-24, #14-27, #14-28

Comment: For description of alternatives, almost none of items 2-8 listed in Appendix C of the Planning Handbook H-1601-1 are clearly discernable from the text and some of the language in Management Common to All Alternatives seems to be in conflict with the other alternatives (example regarding modified suppression AMR vs. full suppression). Under Alt 2, the requirements are not met for item 5 as listed in Appendix C of the Planning Handbook H-1601-1: 5. identify geographic areas where wildland fire use is not appropriate and where suppression action would be taken. Throughout the Fire Management section of Chapter 2, there is little or nothing that meets the requirements of items 2 through 8 listed in Appendix C of the Planning Handbook H-1601-1.

Response: Appendix C of the BLM Planning Handbook H-1601-1, 2005 provides guidelines for developing alternative management actions within the RMP. We believe that BLM has used a thorough process for developing an adequate range of alternatives for fire management and wildland fire use. BLM considered wildland fire use as an option while developing various alternatives, and included it as a management action within Alternative 2. However, WFU was not considered an appropriate or reasonable tool for most areas, and hence was not explored further. We believe the preferred alternative provides the best balance of all fire management options. See also response to #14-26.

Comment Number: #14-26

Comment: Third bullet under 2.4.8 (Alt 2) describes wildland fire use plan for Massacre WSA but it is not clear if that's intended to meet the requirements of item 4 as listed in Appendix C of the Planning Handbook H-1601-1: identify geographic areas that are suitable for wildland fire use.

Response: Yes, identification of wildfire use within the Massacre WSA under alternative 2 meets the guidelines of Appendix C. The management actions identified within Alternative 2 were one set of options within a larger range of alternatives/management actions/options that BLM considered in the Draft RMP EIS. BLM proposed consideration of a wildland fire use plan for a parcel within the Massacre WSA because historically wildland fires in the area were limited to single burning junipers or small clumps of juniper. In addition, access to this area is difficult and remote, and fires are often costly to suppress. However, after further consideration of resource needs, it was decided to use a more flexible appropriate management response for that area under the preferred alternative. If conditions warranted an extreme fire situation, it may be appropriate to consider use of full suppression due to limited resources. In a low fire danger situation, it may be more appropriate to use a contain/confinement or monitoring strategy to save on financial resources. WFU limits our options when the best option may be to immediately suppress a wildland fire.

Comment Number: #14-29

Comment: For fire management, Alternative 2 and preferred alternative, when boiled down, are essentially the same polygons.

Response: The commenter is incorrect. These alternatives are not the same with respect to fire management. Alternative 2 includes the use of wildland fire use as the most appropriate tool for the Maassacre WSA. A more flexible appropriate management response for that area would be undertaken under the preferred alternative.

Comment Number: #14-30

Comment: Brief review and comparison of the fire management, fuels, vegetation, wildlife and cultural resources alternatives indicates that the RMP lacks the coordination required in items 3 and 7 listed in Appendix C of the Planning Handbook H-1601-1: (3) Identify allowable uses and management actions to achieve goals and objectives, and support the goals and objectives for vegetation, wildlife and other resources. (7) Identification of restrictions on fire management practices needed to protect resources.

Response: The discussion in Section 2.4.5 has been revised to address the need to protect sensitive resources and wildlife habitat from fire and fuels management actions. We believe that the identified allowable uses and proposed management actions listed within Chapter 2 for cultural resources, fire, fuels, vegetation, and wildlife are adequate to meet desired future conditions, goals, and objectives, as listed in the PRMP.

Comment Number: #14-32

Comment: Priority fuels management areas should be clearly designated and allocated.

Response: Section 2.4.5 discusses the priorities for fuels management under the Preferred Alternative as: "Treatment would emphasize reduction of excess fuels throughout the management area; however, special attention would be given to the WUI, degraded forest and rangeland (especially removal of invasive juniper), critical wildlife habitats, and vulnerable cultural sites." The WUI priority areas are depicted on Map FUELS-1. The preferred alternative specifies a total potential range of 500 to 5,000 acres annually, of mechanical treatments and/or prescribed burning. The site specific locations of each fuels treatment project would be decided at the activity plan level. Discussion has also been added to Chapter 2.6.5 to further explain the importance of protecting (that is, not burning) important wildlife habitat.

Comment Number: #19-126

Comment: The fire map for preferred alternative (FIRE-1) shows over half of the land managed under AMR. The map legend, colors, markings, and discussions in the text appear to be inconsistent and problems need to be resolved in final.

Response: As stated in Section 2.4 of the Draft RMP EIS and the PRMP / FEIS, the preferred alternative would employ the full range of AMR suppression methods on an area of 328,949 acres, as denoted with the darker green shading in Map FIRE-1; and would employ AMR limited to mainly full suppression on 891,695 acres, as denoted with the lighter green shading in Map FIRE-1. The acreages identified in the text and portrayed on the map are consistent.

Comment Number: #23-5

Comment: Sage Grouse Conservation Planning identified fire suppression as conservation measure to protect R-O Sage Grouse Habitat. There are no references or implementation of state resource plan goals, objectives, or actions in the draft document.

Response: The discussion of full suppression in Section 2.4.5 has been revised to address the need to protect sensitive resources and wildlife habitat; revisions also include further clarification on the relationship between the NorCal Fire Management Plan and the Surprise RMP. Section 2.4.5 has been revised to state: "A full suppression AMR will be used in sage-grouse R-O habitat, as directed in the Sage-grouse Conservation Strategies for the Buffalo-Skedaddle, Vya, and Massacre Population Management Units."

Comment Number: #23-6

Comment: Fuels management section makes assumptions that fire has a role as a natural component or element of restoration without any documentation of fire history in the area. Preferred alternative implements 5,000 acres of prescribed burning specific to fuels and thousands of more acres for other objectives for next 20 years; agency objects to the objective and its origin in land use planning.

Response: The commenter's objection to the preferred alternative for fuels management is noted. Discussion of the fire ecology of the area was appropriately presented in Chapter 3 of the Draft RMP EIS and also in this PRMP / FEIS; see particularly Section 3.6.3, Fire History.

Comment Number: #23-7

Comment: Vya and Massacre Sage Grouse Conservation Plans are not identified as planning statements of the SFO under Fuels Management.

Response: These plans have been added to the list of general guidance documents for Fuels Management (Section 2.6.4) and Wildlife (Section 2.22).

Comment Number: #23-37

Comment: Without benefit of NorCal Fire Plan, we were unable to determine the data and rationale for the "historical fire regime". It would appear the approved Fire Plan has a disconnected origin from the previous land use plan and state resource plans.

Response: Discussion of the fire ecology of the area was appropriately presented in Chapter 3 of the Draft RMP EIS and also in this PRMP / FEIS; see particularly Section 3.6.3, Fire History.

Comment Number: #24-6

Comment: County supports concept of increased prescribed burning as set forth in preferred alternative. However, placing an arbitrary ceiling of 5,000 acres because it might bump up against air quality restrictions seems needlessly restrictive. You might not achieve standards some years even if less than 5,000 acres were burned. Suggest setting a goal of averaging 5,000 acres per year given the air quality standards.

Response: While air quality is a potential impact and concern from fire, it was not the primary driver in determining the upper acreage limit for fuel reduction treatments that included prescribed fire and/or mechanical treatments. Rather, the BLM ID team developed the 5,000-acre upper limit based on best professional judgment and consideration of a number of factors including the NorCal Fire Plan and habitat restoration goals. However, we believe that the preferred alternative includes the most appropriate mix of fire and fuels management measures to adequately meet human safety needs and achieve resource objectives of the SFO.

Comment Number: #24-10, #26-17

Comment: Supports general concept of preferred alternative for fuels management; however, the upper limit of 5,000 acres seems to be a function of air quality. Preferred alternative for fuels management sounds good; however it would seem that prescribed fire and mechanical treatment should be separated. Prescribed fire is limited by air quality concerns whereas in-house hand fuel treatment contributes very little to air pollution.

Response: As explained in the response to the previous comment, please note that air quality was not the primary driver in determining the upper acreage limit. Prescribed fire and mechanical treatment have not been separated in order to maintain the SFO's flexibility in prescribing the most appropriate treatment for a site.

Comment Number: #25-37

Comment: Extreme care should be exercised when planning use of prescribed fire or other vegetation treatments in sagebrush communities in planning area. The EIS should disclose areas where the future use of prescribed fire is proposed, how noxious weeds, livestock grazing, soils, vegetation, wildlife, and other resources will be affected by such management. One study recommends that sagebrush within 1.9 miles of a lek not be burned in order to protect nesting habitat. Fire on the nesting grounds is not recommended in any season if nesting habitat is limited.

Response: In general, we agree with this comment and exercise extreme care in planning use of prescribed fire or other vegetation treatments in sagebrush communities. Our management strategy is consistent with the protection of lek nesting habitat, as identified in various local, state, and national guidelines for managing sage-grouse and their habitats (Conservation Strategy for Sage-Grouse (*Centrocercus urophasianus*) and Sagebrush Ecosystems within the Buffalo-Skedaddle Population Management Unit (Northern California Sage-Grouse Working Group, 2006); Greater Sage-Grouse Conservation Plan for Nevada and Eastern California, First Edition (2004), including the Vya and Massacre Conservation Strategies. Implementation of these conservation strategies, as described in Section 2.22.5, is a major component of our management approach for the protection of sage-grouse and sagebrush ecosystems under the proposed action. Potential impacts from prescribed fire and other vegetation treatments on environmental resources in the planning area are addressed in Chapter 4 of the PRMP / FEIS. In addition, a separate environmental review would be conducted prior to the use of any prescribed fire to evaluate and minimize site-specific impacts on sagebrush communities in the SFO planning area.

Comment Number: #26-15

Comment: Preferred alternative (2.4.10) sounds good, however, prescribed let burn plans land maps should be on file as results of livestock AMPs. A let burn policy based on sound planning and good science could help the environment and range conditions.

Response: We appreciate your comment and suggestion. However, BLM does not have designated "prescribed let burn plans" nor do we have plans to develop such a policy in the future. All prescribed burns on or potentially affecting grazing lands would be coordinated directly with the permittees throughout the planning and implementation process.

9.0 FORESTRY

Comment Number: #7-16

Comment: No logging in roadless areas

Response: In accordance with the Interim Management Policy (IMP), no logging is allowed in WSAs. Prescribed fire and biological treatments would be used as tools for vegetation restoration according to the IMP.

Comment Number: #14-31

Comment: Forestry and fuels management sections fail to identify areas available for planned, sustained-yield timber harvest or special forest products, if any. This would mean a designation of firewood harvest areas. General discussion of fuel wood harvest does not meet requirement to identify specific areas for forest product harvest.

Response: The commenter is correct in noting this omission; however, there are no areas with a sustainable yield of timber in the SFO planning area. Currently, firewood cutting areas are found in fuels treatment areas, which typically change yearly within a specific area.

Comment Number: #26-16

Comment: Preferred alternative for forestry sounds good.

Response: Thank you for your support of the preferred alternative.

Comment Number: #34-4

Comment: Recommend preferred alternative limit post-fire timber salvage sales on commercial forestlands to existing roads and low impact methods.

Response: Site-specific NEPA reviews will be conducted on each post-fire timber salvage sale with the intent to minimize environmental impacts. We are limiting sales on forestlands to existing roads and low-impact methods.

10.0 LANDS AND REALTY

This section is divided into the following subsections:

10.1 – General Comments
10.2 – Land Acquisition and Disposal
10.3 – Transmission / Energy Corridors
10.4 – ROW Siting and Design
10.5 – ROW Access / Private Property Access and Use

10.1 General Comments

Comment Number: #3-1

Comment: Supports all points made in Section 2.7.1 of ELFO RMP regarding management common to all alternatives and requests that they be applied to Surprise RMP as well.

Response: We have reviewed Section 2.7.1 of ELFO RMP and applied these same points to the SFO RMP where appropriate (see revised Section 2.7 of PRMP / FEIS.

Comment Numbers: #5-4, #5-10

Comment: Nut Mountain Allotment 01010 and Sand Creek Allotments: Request that the range improvement status on this allotment remain as is (owned and maintained by commenter until paid off by grazing fee credits) – parenthetical specific to Nut Mountain

Response: There are no plans to change these allotments.

Comment Number: #14-33

Comment: In Lands and Realty, description of no action alternative does not say anything. Actual decisions in two existing MFPs and amendments dealing with lands and realty should be included in the narratives.

Response: The description of the no action alternative has been expanded to clarify existing decisions that would continue to drive actions under the no action alternative. Because a full description of the no action alternative was not reprinted in this PRMP / FEIS, the additional information has been included in the Alternatives Summary Table in Chapter 2.

10.2 Land Acquisition and Disposal

Comment Number: #5-6, #22-1

Comment: One commenter requested that BLM consider specific deeded properties in Nut Mountain and Sand Creek Allotments he would consider for a real estate exchange and those BLM lands he would consider exchanging for. A second commenter requested that additional property be included in lands considered for disposal. Identifies specific lands (with township range information included) in Duck Lake, Duck Flat areas to be included. Also identifies land in High Rock Canyon area under Winnemucca office that would consider for an exchange.

Response: Thank you for your comment and offer for land exchange. Information pertaining to specific land exchanges is better discussed directly with staff in the SFO, and is outside of the scope of the PRMP / FEIS. We encourage you to contact the SFO to discuss specific parcels for our consideration. Note that exchanges would be completed only after a determination is made that the public interest will be well served and the resource values to be disposed are not more than the resource values to be acquired. Additional site-specific NEPA analysis would also be required.

Comment Number: #11-7

Comment: Estill does not oppose preferred alternative to establish zones relative to Land Tenure Adjustments covering parts of all 5 allotments, assuming the grazer and adjacent landowner are given a first right of refusal to acquire the public lands subject to any sale or disposal.

Response: There is no first right of refusal for adjacent landowners to acquire land subject to any sale disposal. However, adjacent landowners would be notified in advance of the sale, and would be provided an opportunity to enter into the bid process. BLM will make every effort to ensure a competitive and successful land sale disposal process.

Comment Number: #24-11

Comment: County supports preferred alternative regarding lands and realty and wishes to reiterate its "no net loss" policy and encourages BLM's continued efforts to comply with it.

Response: Thank you for your support of the preferred alternative regarding lands and realty.

Comment Number: #24-17

Comment: County does not support that portion of preferred alternative that includes active pursuit of non-public lands adjacent to WSAs and only supports the pursuit of non-public lands within WSAs on a case-by-case basis. BLM's limited management resources should be focused on lands already owned.

Response: BLM does focus on management of lands already owned. Individual parcels within the SFO management area have not been specifically identified for acquisition or disposal. However, should parcels with high public resource value be offered by a (willing) seller, BLM would certainly receive and consider all such proposals on a case-by-case basis. Please also note that acquisition of private lands within WSAs is not required to protect wilderness characteristics of lands that were designated as WSAs through the 1979 inventory process. Although current land use plans do not specifically address acquisition of lands within WSAs, it is current BLM policy to respond to all acquisition opportunities through the Lands and Realty program, in support of all resources.

Comment Number: #26-18

Comment: Preferred alternative for lands and realty sounds OK. However commenter opposes any trade or purchase that would leave the counties involved with a lesser tax base. Federal Government already owns too much land in Washoe, Lassen, and Modoc Counties.

Response: Thank you for your support of the preferred alternative, which actually proposes to slightly reduce Federal land ownership in the SFO area. Note also that the impacts of proposed realty actions on Federal "in-lieu" payments to counties are evaluated and summarized in Section 4.10. The very slight reduction in land held in Federal ownership is not expected to substantially reduce the Federal in-lieu payments received by the counties (currently totaling about $1.5 million).

Comment Number: #33-2

Comment: The Forest Service is concerned that disposal of some or all of the lands contained in the South Warner Contiguous and Sheldon Contiguous areas may degrade the South Warner Wilderness and the Sheldon Inventoried Roadless Area by removing a buffer from true wilderness and backcountry management areas.

Response: There are no plans for land disposal in the South Warner Contiguous and Sheldon Contiguous areas; rather, these are planned acquisition areas. Please refer to Map LANDS-1.

Comment Number: #35-13

Comment: Recommend including a stipulation in Section 2.7 (2-37 to 2-38) that disposal of lands with T&E habitat will not occur unless land will be maintained as habitat.

Response: Retaining or acquiring important wildlife habitats is consistent with the proposed management actions under the preferred alternative. Section 2.23.2 of the PRMP / FEIS includes as a management goal the retention of lands with important breeding habitats. Finally, any BLM land disposal would require preparation of a site-specific EA to evaluate potential impacts prior to disposal, including impacts to T&E species and their habitat. If T&E species or critical habitat has the potential to be affected, BLM would prepare a biological assessment and conduct any required consultation in accordance with Section 7 of the Endangered Species Act.

10.3 Transmission / Energy Corridors

Comment Numbers: #6-1, #6-2, #6-3, #6-4, #10-1, #15-2

Comments: Use of existing north-south high-voltage energy lines or corridors will not address need; real need is for east-west corridor north of Lassen National Park. Lassen County Community Development Department has identified potential routes north of Eagle Lake that would appear to facilitate significant segment of this line from Nevada border to the Lassen/Shasta County border. LMUD has adopted a policy to create Lassen Energy Zone to allow "clean and green" energy to be transmitted west directly to California load centers via east-west routes. Lassen County and LMUD, working together to implement LMUD's "Lassen Energy Zone" through upgrade of energy element of County's general plan, would also support east-west routes. BLM needs to consider preserving potential east-west utility corridors to meet state's renewable energy resource goals. BLM's preferred approach will not work as it would close off land that could provide crucial access to generation development. BLM needs to be more flexible in allowing transmission siting to assure development of renewable resources. In the West-wide Energy Corridor process, PG&E identified at least one general corridor with potential to access renewable resources that comes in from the Oregon border around Goose Lake and continues on down to Chico. While it seems that the distance between the Lava WSA and Pit River Canyon WSA is sufficient to accommodate such a corridor, the maps are not detailed enough to provide clarity. Need to support designation of east-west energy corridor between northern California and Nevada.

Response: BLM is aware of the ongoing study to identify east-west corridor routes and is a cooperating agency for preparation of a *West-wide Energy Corridor Programmatic EIS* (PEIS). The Draft PEIS is scheduled to be issued in winter 2006-2007. As such, BLM will work with other agencies in designating appropriate energy corridors on Federal lands in 11 Western States, perform any environmental reviews required to complete corridor designation, and incorporate designated corridors into relevant agency land use plans. The *Preliminary Draft Map of Potential Energy Corridors on Federal Lands* (a document prepared in support of that PEIS) depicts an east-west transmission corridor between northern California and northern Nevada, which will potentially be routed through the Surprise Field Office area. This corridor, when coupled with related renewable generation development, will create markets for renewable energy between California and Nevada and will augment California's energy supplies by allowing additional energy to flow into the state at a northerly point other than the California-Oregon border. BLM will complete the necessary site-specific environmental reviews necessary to identify and evaluate proposed routes within the requisite time frames outlined in the *Programmatic EIS*. Section 2.7.2 of this PRMP / FEIS has been revised to address the need for an east-west corridor transmission route.

Comment Numbers: #11-35, #17-3, #17-4

Comment: Encourages development of energy/utility corridors to develop additional domestic sources of energy. Recommends that BLM take active steps to work with stakeholders at federal, state, and local level to expand the concept of federal Energy Corridors to state-wide utility corridors that include state and local government lands. In addition to addressing existing energy needs, the establishment of state-wide utility corridors must take into consideration reasonable foreseeable development. Commenter recommends that BLM designate areas that are currently occupied by electric transmission lines as energy corridors. (References map PacifiCorp prepared and submitted to DOE on proposed future West-Wide energy corridors as part of EIS. PacifiCorp also submitted GIS data and maps of its current transmission line locations in the area to BLM.)

Response: We have included a management action under the proposed action that, wherever feasible, new development would use existing utility corridors and communication sites. In addition, we allow for the expansion of existing pipeline and electrical transmission corridors of up to a one-mile width, offering further opportunity for development along the same corridor route. However, we also recognize that additional corridors may be designated as future needs dictate, subject to on-site environmental reviews and clearances (such as the east-west corridor noted in comments above). We will work with the appropriate agencies in the development of new energy / utility corridors as they are identified. BLM will complete the necessary site-specific environmental reviews necessary to identify and evaluate proposed routes, such as for the east-west corridor transmission route. Section 2.7.2 and the Executive Summary of this PRMP / FEIS have been revised to address the potential need for new corridor development. See also response to comments #6-1 et al. above.

Comment Numbers: #17-9, #26-34, #26-40

Comment: Document states that development of new utility corridors would not be allowed. However, public lands must provide for needed energy corridors to support the country's growing energy needs. Commenter requests that blanket statements (in Executive Summary and in 2.15) disallowing any additional corridor development be replaced with a statement allowing for corridor development when regional energy needs require it. Information in Utilities, Transportation, and Telecommunications section is not clear. Preferred alternative includes contradictory information (e.g., allows site development and then states no new corridors would be developed). If changes in energy production shift from fossil to renewable, this document should not be developed to create obstructions to change. Appear to be contradictory statements in preferred alternative regarding use of current corridors and communication sites (when it says no new corridors or communication sites would be allowed). Given current energy situation, to state that no new development would occur is very short-sited.

Response: We apologize for the confusing text in the Draft and have revised Section 2.7.2 in the PRMP / FEIS. See also responses to similar comments above.

Comment Number: #29-10

Comment: RMPs should be updated in light of the National Energy Act proposed Trans-Sierra Route alternatives and recognize that such energy transmission corridors and related facilities siting be coordinated and consistent with DOE together with policies and programs of Lassen County and Lassen Municipal Utility District.

Response: As stated above, BLM is aware of the ongoing study to identify east-west corridor routes and is a cooperating agency for preparation of a *West-wide Energy Corridor Programmatic EIS* (PEIS). The Draft PEIS is scheduled to be issued in winter 2006-2007. As such, BLM will work with other agencies in designating appropriate energy corridors on Federal lands in 11 western states, perform any environmental reviews required to complete corridor designation, and incorporate designated corridors into relevant agency land use plans. Section 2.7.2 of this PRMP / FEIS has been revised to address the need for an east-west corridor transmission route.

10.4 ROW Siting and Design

Comment Numbers: #10-2, #10-3, #15-3

Comment: To balance environmental concerns with need for reliable, renewable energy, PG&E believes that corridor widths could be increased to a minimum of one mile to allow adequate room for avoidance of sensitive resources and to maintain sufficient separation of facilities within the corridor so as not to compromise safety, reliability, and national security concerns. BLM's preference to consolidate transmission ROWs does not give consideration to ROW separation for system reliability purposes. For example, ROW separation will typically need to be wider if the lines traverse forest land because a fast moving forest fire can cause outage of both lines if the ROW separation is not wide enough. PG&E urges to include due consideration of system reliability in addition efficient land resource utilization. Need to support objectives of Section 368(d) of Energy Policy Act of developing energy corridors that improve reliability, relieve congestion, and enhance delivery capabilities of national grid.

Response: We agree that factors such as reliability, congestion, and enhanced delivery capabilities are important considerations in the development and selection of energy corridor routes as well as in the determination of sufficient corridor widths. We take such considerations into account when we identify potential utility corridors and manage these corridors for right-of-way development. As stated in the Draft RMP EIS and carried forward in this PRMP / FEIS (Section 2.7), development of utility corridors will be maximized within existing corridors, which are defined as one mile wide, and would minimize impacts on natural values consistent with other resource values.

Utility corridors included in the Western Regional Corridor Study (WRCS) will be available for right-of-way development, unless environmental analysis reveals the likelihood of significant adverse impacts on other resources. As stated in this PRMP / FEIS, corridor width for new corridor development would be 2,000 feet (1,000 feet on either side of centerline), unless adjacent to an exclusion area. In such a case, corridor width would be 2,000 feet opposite the special management area boundary.

While a corridor width for new corridors of up to one mile may be ideal with respect to reliability and sensitive resource avoidance concerns, it is not necessarily practical in terms of (1) the amount of land that would have to be withdrawn from other important public uses; and (2) the challenges in identifying one or more possible routes of this width that avoid exclusion areas or minimize impacts to other special management areas within the SFO, such as WSRs, WSAs, ACECs, CRMA, cultural resources, or important wildlife habitat.

Comment Number: #17-5

Comment: Concerned about locating utility ROW adjacent to existing facilities. Recommends that the EIS and final RMP include guidelines for ROW clearance. For transmission lines we recommend a ROW width of at least 100 feet; for distribution lines, recommend a ROW width of at least 50 feet.

Response: Because decisions regarding ROW clearance, compatibility, and the potential need for special stipulations vary with the site and facility being proposed, we do not believe it appropriate to identify pre-determined clearance widths in the RMP. Rather, these will be more appropriately addressed on a site- and project-specific basis when proposals are first identified.

Comment Number: #17-6

Comment: Concerns about placement of ROW facilities adjacent to each other if any potential issues with safety or incompatibility or resource conflicts have been identified. RMP should include specific provision stating that ROW facilities will not be placed adjacent to each other if issues with safety or incompatibility or resource conflicts are identified. Also concerned about potential for conflict and overlap when a new ROW is added to a utility corridor. BLM should adopt procedures that require all existing entities to be notified when there are plans for an applicant to install a new ROW in a utility corridor to be sure the uses do not conflict with one another.

Response: We consider the inclusion of procedures to address potential conflicts over placement of ROW facilities to be beyond the scope of the PRMP. These are better handled through the ROW grant process, which are site-specific to each ROW facility. Any person holding a ROW facility would be notified at the beginning of the process for considering any new ROW facility that could impact the existing ROW. The existing ROW grantee would be fully included in the process and have sufficient opportunity for comment and input as needed and appropriate.

Comment Number: #19-96

Comment: While pleased that new utility lines or communication sites would avoid ACECs, WSAs, special management areas, and critical sage-grouse habitat under preferred alternative (page 2-75), we request that final version mirror Eagle Lake RMP and propose to make lands both in and adjacent to these areas right-of way avoidance areas (page 4-344 of Eagle Lake RMP).

Response: The SFO PRMP / FEIS would protect WSAs, ACECs, and sage-grouse habitat by making these areas ROW exclusion or avoidance areas. ROWs that provide access to private parcels would not be entirely excluded, however. SFO has decided not to identify areas adjacent to these areas as right-of-way avoidance areas, as we do not believe an additional buffer is necessary to provide the required protection. Specific ROW project proposals will be considered through the rights-of-way authorization process, in accordance with FLMPA, regulations, and BLM policy. Potential impacts to wildlife, visual, and other resources would be considerably reduced by implementation of best management practices (BMPs), other protective measures, and by the requirement that site-specific and species-specific adverse impacts would be addressed comprehensively at the project level.

Comment Number: #21-2

Comment: All future overhead line and towers should be sited along existing rights of way. No new rights of way should be established outside of existing corridors. Previously designated utility corridors that have not been built should not be used where placement of new lines adjacent to existing lines can fulfill the need. Impacts to California sage grouse can be reduced by avoiding sage grouse habitat and placing new lines as close as possible to existing lines.

Response: We agree with this approach and have included a management action under the proposed action that "Development of utility corridors will be maximized within existing corridors (defined as 1 mile wide) and would be designed to avoid impacts to natural resources." In addition, "Development of communication sites would be confined to existing disturbed areas, and no new sites would be developed—except for BLM management and local improvement and upgrade purposes." We also allow for expansion of existing pipeline and electrical transmission corridors of up to one mile, offering maximum opportunity for development along the same corridor route.

Comment Numbers: #35-21, #35-22

Comment: For preferred alternative, recommend that future electric utility line developments follow guidance provided by USFWS/electric utility industry's Avian Protection Plan Guidelines, 2005. For preferred alternative, recommend that future communication site development be consistent with USFWS "Guidance on the Siting, Construction, Operation and Decommissioning of Communication Towers" to minimize effects to migratory birds.

Response: Effects of site-specific utility line development projects would be comprehensively addressed in separate NEPA documentation at the project level. However, potential impacts to wildlife and visual resources would be considerably reduced by programmatic best management practices (BMPs). Adverse impacts to wildlife and their habitats from wind energy development would be avoided or minimized by following the U.S. Fish and Wildlife Service's *Interim Guidelines To Avoid And Minimize Wildlife Impacts From Wind Turbines*, 2003. Section 2.7.2 has been revised to clarify that future BLM-granted rights-of-way, including utility corridors and communication sites, would be consistent with USFWS guidance to minimize effects to migratory birds.

10.5 ROW Access / Private Property Access and Use

Comment Numbers: #5-2, #5-8

Comment: Nut Mountain Allotment 01010 and Sand Creek Allotments: Request that all of commenter's private property access (ingress and egress) remain open and unrestricted as it currently is.

Response: Management actions in the PRMP will not impact private property access (ingress and egress).

Comment Number: #16-1

Comment: Companies own property within Wall Canyon WSA. The WSA should not prohibit or restrict a private landowner from obtaining a right of way on public lands. The planning document in part confirms no visual impact specifically in Class I areas and the planning document is unclear as to whether pipelines, access roads, utility lines, and infrastructure will be impaired or jeopardized as a result of the WSA. If this is not the case, an expression of this intent should be incorporated by reference into the planning document. Use of private or public lands outside the Wilderness Areas should not be restricted because of the property's proximity to the Wilderness Area. If the existing wilderness study areas are managed with a visual resource management designation of Class I, requiring protection of scenic quality and other restrictions. If the existing wilderness study areas receive a wilderness classification, the visual resource management designation of Class I will remain, however, those restrictions should not impair existing or future uses on neighboring properties or future uses. We are concerned if a standard is adopted by BLM, which in effect, provides visual changes may be seen but should not attract the attention of the casual observer, this provision may prohibit or impair the Companies existing entitlements or future ability to access its property for personal and/or development purposes and/or obtain BLM right of way permits.

Response: BLM has no authority on private land and the rights of private landowners would continue regardless of adjacent land use designations. Owners of private land surrounded by public land (managed under the FLPMA) would be granted access across public land to permit reasonable use of their property. Rights-of-way established across public lands prior to the passage of the FLPMA would be recognized as a valid use.

Regarding VRM Class I designation, note that management of WSAs is governed by BLM's Interim Management Policy for Lands under Wilderness Review (IMP) until Congress makes a decision regarding wilderness designation. The IMP regulates that all WSAs be managed as VRM Class I.

Comment Numbers: #16-4, #16-5

Comment: There are significant water resources that may be affected by this RMP, particularly as they affect Tuledad Creek, Wall Canyon Creek, Lost Creek, and some of the other streams that drain into the Duck Flat. The RMP and EIS should be revised to reflect Companies priority and vested rights to its water resources. All private land owners should not be prohibited, for example, from transporting its water from its property through public lands. The planning document should include a statement confirming in all of the proposed ACECs that right of way permits may be issued without additional restrictions. There may be other land use conflicts with the Companies property and the RMP should remain flexible and allow for potential future amendments to the plan on a case-by-case basis to prevent restricting future uses on neighboring properties or fringe areas.

Response: BLM has no authority on private land and the rights of private landowners would continue regardless of adjacent land use designations. Owners of private land surrounded by public land (managed under the FLPMA) would be granted access across public land to permit reasonable use of their property. Rights-of-way established across public lands prior to the passage of the FLPMA would be recognized as a valid use. ACECs have been designated as such as per BLM policy to manage and protect unique and important resources, including cultural resources, scenic resources, sensitive vegetation, and important wildlife habitat. Due to the sensitive nature of these relevant and important resources, all ACECs have been designated as ROW avoidance areas. This means that any applications for new ROWs or utility corridors would undergo a site-specific NEPA review, and would only be granted if BLM concurs 1) the only feasible location is within the ACEC, and 2) no relevant and important resources would be adversely affected. It is incumbent on the ROW applicant to investigate and document that the only feasible location is within the ACEC. BLM will utilize the applicant's documentation to evaluate concurrence.

However, utility corridors included in the Western Regional Corridor Study (WRCS) will be available for right-of-way development, unless environmental analysis reveals the likelihood of significant adverse impacts on other resources.

Comment Number: #17-7

Comment: RMP should include the definition of an "electrical emergency condition" (definition provided in comment) – in such a situation PacifiCorp must be able to enter onto and conduct repairs or adjustments within a ROW area governed by a ROW grant.

Response: We understand the commenter's concern and can include the definition of "electrical emergency condition" in the ROW grant, or amend an existing ROW grant as needed to assure access to address this particular condition.

Comment Number: #17-8

Comment: PacifiCorp has secured ROW easements, authorizations or rights, and all necessary or customary ingress and egress to its structures and facilities. The planning effort should recognize valid existing rights.

Response: Such rights are more appropriately recognized in the ROW grants, which we consider to be the proper forum; their specific inclusion in the PRMP is a level of detail not appropriate to this land use planning level document.

11.0 LIVESTOCK GRAZING

This section is divided into the following subsections:

11.1 – Rangeland / Land Health Assessments and Permitted Use Levels
11.2 – Permittee Maintenance Responsibilities
11.3 – Sheep
11.4 – Allotment-Specific Decisions
11.5 – Forage Allocation / Production
11.6 – Impacts on Livestock Grazing
11.7 – Impacts from Livestock Grazing
11.8 – Alternatives
11.9 – Affected Environment - Livestock Grazing
11.10 – General

11.1 Rangeland / Land Health Assessments and Permitted Use Levels

Comment Number: #11-14

Comment: Fails to disclose methodology (to determine permitted use levels) on which assessments would be made.

Response: Any changes in carrying capacity would be consistent with BLM manuals and procedures. While we don't want to be limited to a specific method(s) for determining carrying capacity, BLM commonly uses one or more year's utilization data, actual use data, along with an ecological site inventory. These monitoring procedures are outlined in Technical References 1734-3 and 1743-4. Any increases or deceases in carrying capacity must be consistent with meeting land health standards, and guidelines for grazing, as shown in Appendix B.

Such reviews would be conducted on individual allotments through assessment of existing activity plans (allotment management plans or their functional equivalents); they are not appropriate at the RMP level of review. Land/rangeland health assessments and formal determinations of health on which use levels would be based, as well as decisions regarding appropriate grazing strategies and adjustments in existing levels of use, would all have to comply with the Northeastern California and Northwestern Nevada Standards and Guidelines for Livestock Grazing (see also Appendix B to the PRMP / FEIS for more information pertaining to the Standards and Guidelines).

Comment Number: #11-22

Comment: When making equitable adjustments between livestock AUMs and wild horses and burros AMLs, consideration is given to certain factors as identified in comment.

Response: Consideration of past wild horse populations would occur during the analysis and evaluation of the monitoring data. BLM would take the appropriate action, if data indicate that resource damage is likely to continue at AML, based on reasonable projections of carrying capacity or resource impacts from wild horse grazing. Current policy is to gather the excess of wild horses to the low AML, and then manage horses at or below high AML or the "optimum number" of wild horses. To decrease the likelihood that the horse population is above AML, gathers would be conducted on 3 to 4 year intervals.

Comment Number: #20-1

Comment: FEIS should consider including portions of minimization measures included in Alt 2, such as reduction in AUMs or a reestablishment of special status species. BLM should consider some reduction in actual AUMs in the SFO planning area, with a focus on Category 1 allotments.

Response: The commenter's preference is noted. However, we believe that the preferred alternative is sufficiently focused on Category I allotments where grazing levels would be further adjusted or reduced as needed.

Comment Number: #20-2

Comment: FEIS should ensure that future AUMs are based on the annually reported rangeland health conditions.

Response: Permitted grazing use—including reduction of animal numbers and/or season-of-use—would be assessed annually to reflect prevailing rangeland health conditions. Conservative management of grazing would be especially needful during drought conditions, when there would not be enough water to support livestock for an entire grazing season.

Comment Number: #23-8

Comment: Standard operating procedures should be included and details provided to assure the implementation of Rangeland Federal Regulations (Rangeland Health Assessments, Susanville RAC standards and guidelines).

Response: Appendix B of this document describes the land health assessment on-the-ground procedures and identifies the 17 land health indicators used in making an assessment. Recommended grazing strategies and permitted use levels would be consistent with the approved Standards for Rangeland Health and Guidelines for Livestock Grazing Management in Northeastern California and Northwestern Nevada (Standards and Guidelines) (July 2000) included in Appendix B.

Comment Number: #23-11

Comment: Utilization limits on key species are elements of Guidelines and should not be considered targets.

Response: Terminology has been changed in Section 2.8 from using word "target" in reference to limits or guidelines for utilization of key species.

Comment Number: #23-38

Comment: Section 3.9.3: It is unclear how Rangeland Health Guidelines are applied and conditional to livestock grazing authorizations.

Response: As stated in Section 3.9.3, Guidelines 1-15 and 17 apply at all times and, where appropriate, to all areas of public lands. If one or more of the Rangeland Health Standards are determined to not be met, and progress is not being made towards meeting the Standard(s) as a result of current livestock grazing practices, then the appropriate portions of Guideline 16, limiting livestock utilization, are applied. Additional information on the application of Rangeland Health Guidelines in contained in the Implementation section of Appendix B.

Comment Number: #23-50

Comment: Legal authorities require livestock permits to be in compliance with Standards and Guidelines by a defined schedule. These matters should be specific in the pending ROD.

Response: We agree. These matters will be identified in the Record of Decision (ROD) to the PRMP / FEIS.

Comment Number: #25-7

Comment: Stating that specific standards will be developed at site specific level violates law and allows degradation to continue. Need to include allowable use standards and guidelines and/or objectives paramount to achieving or maintaining standards.

Response: It is not possible to set grazing levels until a formal determination of land health has been made/completed. Such determinations have not yet been made for all allotments. These determinations will form the basis for setting livestock grazing levels in the SFO planning area. While completing these determinations is a priority for the SFO – and we have made good progress – it is a very intensive process. We do not expect to complete this work until 2009. Recommended grazing strategies and permitted use levels would be consistent with the approved Standards for Rangeland Health and Guidelines for Livestock Grazing Management in Northeastern California and Northwestern Nevada (Standards and Guidelines) (July 2000). These Standards and Guidelines are identified in Appendix B of the PRMP / FEIS. Please also see Appendix B for BLM reporting requirements regarding progress in rangeland health assessments. The process involves two major steps: first is to conduct a rangeland health assessment – which has been completed for all allotments; second is to conduct a rangeland evaluation. In summary, the assessment characterizes the status of resource conditions so that status can be evaluated relative to land health standards; it sets the stage for an evaluation, but it is not a decision. The rangeland evaluation takes the results from the assessments and evaluates the degree of achievement of Land Health Standards; it also analyzes the causal factors for not achieving a land health standard. An evaluation of the causal factors provides the foundation for a determination. Each of the 5 standards and 17 guidelines are included in Appendix B of the PRMP / FEIS. The standards are expressions of physical and biological condition or degree of function required for healthy, sustainable rangelands. They relate to the capability or potential of a specific site; some standards may not apply to all acres. The guidelines for grazing management are the types of grazing management methods and practices determined to be appropriate to ensure that standards can be met or significant progress can be made toward meeting the standard. Guidelines are designed to provide direction yet offer flexibility for implementation through activity plans and terms and conditions for grazing permits.

Comment Number: #11-19

Comment: Request clarification on page 2-41 relative to target utilization of key species: literature and science support that in many cases use levels should exceed 60% to maintain the vigor of native and non-native plants, particularly where a wolf-plant problem exists.

Response: There maybe site specific instances where utilization limits or guidelines could be increased. Examples include crested wheatgrass seedings that have been rested for extended period of time. Also refer to Comment Response #25-7, above.

Comment Number: #25-9

Comment: The discussion of standards fails to include which species are key species.

Response: Key species are determined at the activity plan level. Also refer to the Final EIS for the Rangeland Health Standard and Guidelines for California and Northwestern Nevada, Section 3.2.5.

Comment Number: #25-28

Comment: Stating that stricter standards will improve range in declining conditions is a failure to disclose impacts and ignores real problem (may need to remove the cause). Restoration of degraded riparian areas is often ignored goal in land use plans and should have been considered in RMP. GAO study showed that restoring riparian areas was best accomplished by removal of livestock. Rest (in rest-rotation strategies) may not compensate for the increased use during grazing until sufficient recovery is achieved.

Response: Restoration of degraded riparian areas is an important objective of this RMP, as stated in Chapter 2.15. SFO has a list of priority perennial and intermittent streams and priority is also set based on riparian functional assessment rating of the riparian system and the associated resource values (see Section 2.15) Riparian assessments within the SFO are done on a site-specific basis, which allows BLM to carefully examine the causes of any degraded areas, and also work towards restoring those areas. The SFO has several local examples of improved riparian areas using changes to grazing season of use, or other improved grazing strategies. To address impacts from grazing, emphasis will be on adjusting existing grazing strategies where livestock grazing is limiting progress toward land health goals, PFC, and DFC – that is, “at risk” or Category 1 sites. Once the ecological potential of the riparian community is determined, site-specific riparian management objectives and management actions would be established. In the meantime, based on short-term monitoring, changes have been made to the Category 1 allotment terms and conditions to improve rangeland health. Rangeland improvement projects have also been made to minimize unacceptable livestock grazing impacts to riparian and spring areas and to improve livestock distribution.

Section 2.15.5 of the PRMP has been revised to include the following management actions: “Prescribed fire, manual, and mechanical treatments will be used to restore 50 to 100 acres per year of riparian areas. Treatments will be prioritized to achieve healthy and productive wetland and riparian habitats, and achieve habitat diversity and hydrologic stability. Livestock salting will not be permitted within one quarter-mile of springs, meadows, streams, aspen stands, and archaeological sites. Suitable locations would be determined by BLM in consultation with livestock permittees.”

Comment Number: #26-21

Comment: Statement on page 2-39 (second to last paragraph) believed to be half-truth – the Northeastern California and Northwestern Nevada RAC recommendations for standards were quite different than these presented. However, Secretary Babbitt chose to force his will on this area and pressured the acting state director to implement standards other than those recommended by the RAC. He in fact did not take the advice of his appointed resource advisory committee! Please delete these standards

Response: The Standards and Guidelines for Northeastern California and Northwestern Nevada (S&G) were developed in full consultation with Resource Advisory Council (RAC). The Record of Decision for the S&G provides a response to the protests filed, and states in part, there was not full concurrence of all the RAC membership for all standards and guidelines.

Comment Number: #31-3

Comment: Unable to find criteria used to determine that grazing is allowable on the 30% (of those evaluated) that are not meeting or making progress towards one or more of the standards in which grazing practices are at least partially responsible.

Response: As stated in the introduction to Chapter 2.8, changes in livestock management actions have already been made for the five allotments (30%) determined to not meet, or to not making progress towards meeting, one or more of the standards due at least partly to recent grazing practices. However, this designation does not necessarily preclude livestock grazing. There are a variety of management options that could be implemented, including changes in season of use, and livestock numbers. On several allotments, fencing of riparian areas to exclude livestock and wild horses has resulted in Standards being achieved.

11.2 Permittee Maintenance Responsibilities

Comment Numbers: #8-3, #11-17, #24-5, #26-22

Comment: Concerned about significant increase in fencing maintenance from measures proposed to protect areas from grazing, OHVs, etc.; need to develop maintenance strategy as grazers should not be assigned the increased workload. Reject adoption (page 2-41) of maintaining 5500 acres of existing livestock exclosure fencing; this puts unreasonable burden on grazers. Need to develop fence maintenance strategy that utilizes resources other than grazers (offers suggestions). 2.8.5 paragraph 5. Exclosure fences are a good tool for management; however, their purpose should be clear, as should the parties responsible for their construction and maintenance.

Response: We acknowledge that grazing permits place responsibility for fence repair and maintenance on the permittees, although BLM does maintain a significant number of fences in the SFO. We agree that some of the proposed protection measures (specifically additional exclosures) would place an added burden on the livestock operators/permittees, and BLM would work with the permittees to determine, on a site-specific basis, how much additional fencing maintenance would be needed and reasonable to require. As stated in Chapter 2.8.5, existing infrastructure (pasture and allotment fences) or topography would be used whenever possible to minimize construction of additional fencing, even if this increases the area from which livestock are excluded. The suggestion to use other resources for maintenance is a good one and we note that BLM does use fire crews for fence work when they are available. As stated in Chapter 2.8.5, BLM would consider long-term exclosure fencing only if required to meet Standards for Rangeland Health, to meet the needs of special status species, or to protect National Register-quality archaeological sites. Additional livestock exclosures would be considered when no other practical or affordable options exist for mitigation of grazing effects. Further, we agree that building and maintaining 5,500 acres of exclosure fencing is burdensome for the permittees and for BLM and that other management options must be considered prior to constructing new exclosures.

Comment Number: #11-18

Comment: Reject references on page 2-41 that any water development should consider wild horses. Permittees should not be asked to water wild horses.

Response: Some permits do place responsibility for water maintenance on the permittees; however, BLM would work with the permittees on a site-specific basis in determining what additional activities would be necessary and reasonable. For example, water already provided for livestock could also be used by horses, which should not put additional burden on the permittees. Development of a major new water source, such as a pumping well, would not be considered a reasonable requirement.

11.3 Sheep

Comment Numbers: #11-25, #21-8, #25-23, #26-25

Comment: One commenter rejected the notion that continued domestic sheep grazing is subject to “no evidence of disease transmission from domestic to bighorn sheep,”, stating that there is no scientific validity provided for risk of disease transmission between domestic sheep and bighorn sheep and providing many references to support argument. Another commenter stated that (1) converting sheep permits to cattle permits after domestic sheep disease has been transmitted to bighorn sheep does not provide the required level of protection for this threatened species; (2) it could be detrimental to convert cattle permits to sheep permits in or near bighorn sheep habitat—no new sheep permits should be allocated and permit numbers should be lowered to protect current introduced bighorn sheep meta-populations and possible locations of future introductions; and (3) trailing sheep within nine miles of occupied bighorn sheep habitat should only be permitted when safeguards can be implemented to prevent physical contact. A third commenter stated that the EIS fails to take action that would eliminate domestic sheep in areas occupied by bighorn sheep. A fourth commenter stated that the statement on page 2-44 (paragraph 3) regarding continued grazing of sheep conditioned on no evidence of disease transmission to bighorn sheep and conversion to cattle use if such evidence appears) is unacceptable and should be eliminated; reasons for concern include lots of room to be non-adjacent, good tools for range management, part of culture, history, and economic base, among other reasons.

Response: The scientific evidence regarding the susceptibility of bighorn sheep to disease transmitted by domestic sheep is still open for debate. We will continue to monitor developments and amend our actions accordingly, in consultation and cooperation with state wildlife agencies (CDFG and NDOW), as needed in the future. The currently proposed management actions for bighorn sheep are described in Chapter 2.22.5.4.

Comment Number: #24-14

Comment: County has concerns over language addressing conflicts between domestic and bighorn sheep. Science is not as clear cut as the preferred alternative makes it sound. Sound science should be the decision maker. Conversion of sheep numbers to cattle within allotments that contain both sheep and cattle at present will most likely produce a reduced level of grazing. The paper conversion of sheep to cattle does not account for the complementary nature of jointly grazing cattle and sheep.

Response: The Preferred Alternative for domestic sheep grazing in relation to bighorn sheep has been revised in both Sections 2.8 Livestock Grazing and 2.22 Wildlife and Fisheries. This new language better follows along with current BLM national guidance for bighorn sheep. While bighorn were historically found on the Warner Mountains, BLM feels that the current alternative allows domestic sheep grazing to continue while keeping more than 80% of bighorn habitats free of domestic sheep. The following is the new language and will be found in the Section 2.8.5 and Section 2.22.5.4:

Grazing of domestic sheep would continue on the Tuledad, Selic-Alaska, and Red Rock Lake allotments, unless in the future the current operator elects to convert the livestock kind from sheep to cattle or if the allotments are vacated for reasons unforeseeable at this time. Due to the interest of state game agencies to reintroduce bighorn back into the Warner Mountains, any subsequent request to convert permits from cattle back to sheep would be coordinated with livestock operators and the state game agencies.

In addition, the status of bighorn re-introduction potential in the South Warner Mountains re-evaluated through the NEPA process. There are no other domestic sheep allotments within the field office area and bighorn sheep have been reintroduced into suitable habitats throughout the field office area therefore no other allotments are permitted for domestic sheep grazing. Trailing may be allowed in allotments closed to domestic sheep grazing in compliance with BLM's "Guidelines for Managing Domestic Sheep and Goats in Wild Sheep Habitats". Voluntary changes or conversions of the permits from domestic sheep to cattle grazing provide the Surprise Field Office the opportunity to coordinate with state wildlife agencies and other cooperators in developing a reintroduction plan for California bighorn sheep prior to reintroduction efforts. Habitat management would focus on producing grasses and forbs in early to mid-seral stage habitats where applicable.

BLM's "Guidelines for Managing Domestic Sheep and Goats in Wild Sheep Habitats" (BLM 1998) provide operational guidance for domestic sheep and goat management in the Field Office. The Guidelines cover many aspects of grazing domestic sheep in the vicinity of bighorns and are listed here. Future revisions to the guidelines would apply also.

"1. State wildlife and Federal land management agencies, native wild sheep interest groups, and domestic sheep and goat industry cooperation and consultation are necessary to maintain and/or expand native wild sheep numbers. When agency and industry agreement has been reached to maintain and/or expand native wild sheep numbers, the agencies and the domestic sheep industry will be held harmless in the event of disease impacting either native wild sheep or domestic sheep and goats.

2. Domestic sheep or goat grazing and trailing should be discouraged in the vicinity of native wild sheep ranges.

3. Native wild sheep and domestic sheep or goats should be spatially separated to reduce the potential of interspecies contact.

4. In reviewing new domestic sheep or goat grazing permit applications or proposed conversions of cattle permits to sheep or goat permits in areas with established native wild sheep populations, buffer strips surrounding native wild sheep habitat should be developed, except where topographic features or other barriers minimize physical contact between native wild sheep and domestic sheep and goats. Buffer strips could range up to 13.5 kilometers (9 miles) or as developed through a cooperative agreement to minimize contact between native wild sheep and domestic sheep and goats, depending upon local conditions and management options.

5. Domestic sheep and goats should be closely managed and carefully herded where necessary to prevent them from straying into native wild sheep areas.

6. Trailing of domestic sheep or goats near or through occupied native wild sheep ranges may be permitted when safeguards can be implemented to adequately prevent physical contact between native wild sheep and domestic sheep or goats. BLM must conduct on-site use compliance during trailing to ensure safeguards are observed.

7. Cooperative efforts should be undertaken to quickly notify the permittee and appropriate agency to remove any stray domestic sheep or goats or wild sheep in areas that would allow contact between domestic sheep or goats and native wild sheep.

8. Unless a cooperative agreement has been reached to the contrary, native wild sheep should only be reintroduced into areas where domestic sheep or goat grazing is not permitted.

9. Extraordinary precautions will be followed to protect special status subspecies, e.g., federally listed threatened, endangered, proposed and candidate subspecies, State listed subspecies and BLM sensitive subspecies."

Comment Number: #36-3

Comment: Sheep require different management—location of the base camp is more important. Sensitive areas should be excluded from grazing by locating the base camps at least ¼ mile from these areas, and herding to avoid. Watering of sheep directly in surface waters is not as much of a problem as with cattle.

Response: BLM regulates trailing and bedding areas and there are permit stipulations for no camping on watering holes and sensitive habitat areas. Currently, there are only 3 sheep allotments within the SFO. At this time we do not have any information or data that supports sheep camps are contributing to degrade water quality conditions, or not meeting rangeland health standards. If information becomes available, then sheep camp restrictions would be stipulated, as a term and condition of a grazing permit. We will continue to monitor livestock movements and water quality and consider the implementation of BMPs, as needed and appropriate, should problems arise in the future or the numbers of sheep or allotments increase.

11.4 Allotment-Specific Decisions

Comment Numbers: #5-3, #5-9

Comment: Nut Mountain Allotment 01010 and Sand Creek Allotment: Request that all commenter's suspended AUMs be maintained as is (suspended in status or reinstated with proper review).

Response: The RMP is not allocating livestock grazing preference as shown on individual grazing permits. Therefore, there would not be any specific changes to a permittee's grazing permit preference (active use or AUMs held in suspension) as a result of RMP implementation. Any changes in grazing preference as listed on permits would occur in accordance with the grazing regulations, specifically 43 CFR 4110.3, and 4110.3-3.

Comment Number: #7-11

Comment: Permanently cancel all livestock allotments not currently in use or that have been vacant for over a year.

Response: This proposal would not be allowed under BLM regulations.

Comment Numbers: #11-1, #11-2, #11-3

Comment: Draft RMP does not contain discussions of alternatives, affected environment, or environmental consequences relative to specific allotments. Commenter can't discern where we are and intending to go. Need specific discussions of what standards were met or not met and the basis for the findings and where

Response: The identification and evaluation of individual allotments is not appropriate for the level of detail appropriate to an RMP and the level of decisions that it supports. The actions in this PRMP / FEIS are designed to provide general management guidance in most cases. Decisions regarding specific allotments, such as changes to class of livestock authorized and future suitability of existing allotments for grazing, would be made at the activity plan level. This would be done when plan assessments reveal changes are necessary and compatible with RMP and activity plan goals and objectives. These plans and processes would address more precisely how a particular area or resource is to be managed, and additional NEPA analysis and documentation may be conducted as needed. Permittees would be notified in advance, and have the opportunity to participate in the environmental review process.

Comment Number: #14-39

Comment: The last paragraph on page 2-41 identifying allowable use of 40-60% utilization is not consistent with portions of several allotments in existing MFPs.

Response: We have reviewed this information again and find it to be accurate as written. The existing MFPs also recommended light utilization on bitterbrush by livestock grazing.

Comment Number: #16-2

Comment: Requests that grazing entitlements remain in place without restriction or changes to existing quantity of livestock allowed to avoid impacts to BHC lands.

Response: The proposed action as defined in the PRMP / FEIS would initially retain the same use levels with respect to grazing entitlements. No change would be made unless future assessments indicate adjustments are needed relating to land health standards. Any adjustments (increased or decreased use levels) would be implemented in full consultation and coordination with the permittee, and would not include allotment cancellation or conversion (e.g., from sheep to cattle), unless the permittee voluntarily agreed to such a change. As stated in the revised Section 2.8.5 of this document, permitted grazing use—including reduction of animal numbers and/or season-of-use—would be assessed to reflect prevailing conditions.

Comment Number: #21-10

Comment: Correction and remediation should be required of lessees if negative consequences are detected. Allotments should be suspended if it is operating outside of prescribed allotment conditions or where allotment activities have or are creating damage to native ecosystems, with increasingly severe consequence for repeated violations; requests these be written into every allotment agreement.

Response: Suspension of allotments is one option available to BLM. However, activities related to repeated violations would normally result in a grazing permit being suspended. If resource conditions justify making all or part of an allotment unavailable to grazing, we also have that option. We would apply terms and conditions as needed to grazing permits to assure compliance with rangeland health standards.

Comment Number: #21-13, #31-2

Comment: The 20 allotments not already assessed for rangeland health need to be assessed and new adequate AMPs need to be completed on all livestock grazing allotments before grazing is allowed to continue. How can you justify allowing grazing on 49 allotments when only conducted evaluations of rangeland health standards on only 29?

Response: BLM policy allows continued grazing at existing permitted use levels (AUMs) while we continue to conduct assessments of existing activity plans on individual allotments. Decisions regarding adjustments to existing levels of use, forage allocation, allotment boundaries, and changes to management level categories are more appropriately made at the activity plan level rather than in the RMP. Changes to class of livestock authorized and future suitability of existing allotments for grazing would also be made at the activity plan level. As time allows, AMPs will be completed on the priority allotments, that is, allotment management plans will be completed or revised for all priority (category 1) allotments, followed by lower category allotments as budget and time constraints allow. Assessment of the remaining 20 allotments is expected to take approximately three years and to be completed by 2009.

Comment Number: #23-12

Comment: Retired allotments should be allowed to be banked by BLM. Specific provisions of RMP should directly address this issue to create opportunities to better manage federal lands.

Response: The PRMP / FEIS, under the proposed action, provides for the potential to use allotments, when a grazing permit is voluntarily retired, as a forage reserve to help maintain economic viability to the community. Chapter 2.8.5 has been revised to clarify this option.

Comment Number: #26-24

Comment: Under 2.8.5 Management Common to All Alternatives regarding relinquishment of grazing permit or preference (page 2-42): Request that BLM insert a statement, as 1A or other appropriate location, that would first offer the relinquished permit or abandoned AUMs to the permittees associations, other permittees on common allotments, or other permittees on other adjacent permit or allotment. This should be done prior to items 2 through 4 of the statement.

Response: Relinquishment of grazing preference would be consistent with BLM regulation and current policy. Upon receiving a request for relinquishment, BLM would make a determination if continued livestock use is consistent with meeting rangeland health standards, or depending on the issues, the lands associated with the relinquishment could be committed to other uses.

Comment Number: #30-3

Comment: Recommend that RMP include a grazing allotment management decision matrix for planning area similar that that recently adopted by BLM Prineville District in Oregon for Upper Deschutes Resource Area.

Response: We have seen the particular matrix referenced by the commenter, and it addresses livestock grazing and public (recreational) conflict issues, which have not been identified as significant issues in the SFO management area. While we acknowledge the value of such a matrix for use as a planning / decision tool, the issues it covers are not appropriate to our land use planning effort.

Comment Number: #24-15

Comment: While supporting preferred alternative for grazing, the County suggests a statement be included that acknowledges that suspended use AUMs are present and that when appropriate conditions exist in individual allotments, full consideration will be given to dedicating the resources necessary for completing the analysis to restore these numbers.

Response: When additional forage becomes available on a sustained yield basis, suspended AUMs can be appointed to permittees. This statement has been added to Chapter 2.8.5 and Section 3.9.3.

Comment Number: #25-1

Comment: Request that RMP include provision to allow BLM and/or permittees to permanently retire grazing allotments when conditions permit.

Response: This is not an option available to us under BLM regulations. However, we do occasionally get a voluntary relinquishment request. The PRMP / FEIS, Section 2.8.5, also provides for the potential to use them as grass banks if the allotment is meeting rangeland health standards. When a grazing permit is voluntarily retired, the allotment could be considered for use as a forage reserve, or the allotment could be devoted to other uses.

Comment Number: #26-4

Comment: Plan should include the total number of AUMs allocated to Surprise resource area – i.e., total number of AUMs, number of active AUMs, 20% of AUMs that were temporarily suspended west wide in the 1960s, and the AUMs that have been suspended on various allotments until improvements in management and range conditions were met.

Response: When additional forage becomes available on a sustained yield basis, suspended AUMs can be appointed to permittees. This statement has been added to Chapter 2.8.5 and Section 3.9.3.

11.5 Forage Allocation / Production

Comment Number: #11-16

Comment: Reject adoption of BLM policies regarding use of native plant materials in California when seeking to rehabilitate wild or prescribed burn areas or augment forage resources of an area. Cost or unavailability of native seed might allow noxious weeds or other undesirable plants to obtain a stronghold there instead.

Response: As described in Section 2.15.5, locally gathered, native seed (or non-local native seed when local seed is unavailable) will be used for post-fire stabilization and rehabilitation, wildlife habitat restoration, forage augmentation efforts, and other such projects. However, BLM acknowledges that in some instances where re-seeding with native seed is not possible, the use of non-native seed may be necessary, such as to re-establish vegetation and facilitate erosion control. The use of non-native seed would be determined on a case-by-case and site-specific basis in accordance with existing BLM policy.

Comment Number: #11-28

Comment: Reject concept that forage production and availability naturally fluctuate annually (page 3-52 in SFO Draft RMP).

Response: Thank you for your opinion. BLM believes there is ample evidence and research to support the fact that vegetation production, and hence, forage availability are dependent on the amount of annual (or seasonal) rainfall that an area receives.

Comment Number: #25-12

Response: BLM has failed to accurately and quantitatively determine how much forage capacity is currently available. RMP Draft EIS fails to properly allocate that forage to watershed and stream protection, wildlife habitat and food, then to livestock if available.

Response: A rangeland inventory has not been conducted to specifically determine forage capacity for this RMP. Rather, we have carried forward existing permitted AUMs based on previous and ongoing assessments conducted to assess grazing allotment conditions and land health assessments. We will update / modify this information as we complete our standards evaluation and as land health conditions warrant. In the meantime, we would observe and conduct photo monitoring to ensure that the guidelines are being followed and capacity is not being exceeded. Where impacts from livestock are identified, SFO would make the necessary adjustments to livestock grazing activities with which the permittees would have to comply. All grazing activities would have to follow the Standards and Guidelines contained in Appendix B of the PRMP / FEIS. In particular, Guideline 17 of the Standards and Guidelines requires that rangeland monitoring be conducted to determine utilization of forage resources and trend of rangeland health in each allotment based on current accepted practices and techniques as directed in the Interagency Technical Reference: *Utilization Studies and Residual Measurements* and *Sampling Vegetation Attributes*.

11.6 Impacts on Livestock Grazing

Comment Number: #8-7

Comment: Would like to see a strong commitment to grass banking in preferred alternative. It's a given that there is no unused private forage in Surprise field office area. Consequently grazers will be forced to outbid existing lessees for local grass or truck their livestock out of the area. Both options would be a financial burden that could be addressed, in some part, with a grass bank, whether it were entirely on federal ground or some combination of federal and private land. Smaller ranching operations would be especially hard hit without this mitigation.

Response: Thank you for your comment. Your position is consistent with our proposed action in the PRMP / FEIS. While no opportunities currently exist for grass banks (i.e., no vacant lands or allotments exist), their establishment would be considered as future opportunities arise. Proposed management actions include establishing "forage reserves or 'grass banks' where feasible, in cooperation with federal, state, and private agencies, for conservation benefits and management flexibility, thus helping to maintain rangeland health standards. Forage reserves would facilitate juniper treatment and other rangeland improvements by providing alternative areas for livestock grazing. When a grazing permit is voluntarily retired, the allotment will be considered for use as a forage reserve."

Comment Number: #11-31

Comment: Reject concept on page 4-67 regarding impacts of wild horses on livestock grazing that season, duration, and frequency of wild horse use cannot be controlled. It can through timely census and removal of excess horses.

Response: While excess herd can be controlled through timely census and removal, thus reducing the overall intensity of impacts, the impacts, duration, and frequency of wild horse use from herds at AMLs may still cause a problem. Since the implementation of the current Land Use Plan, management emphasis has been on Category I (Improve) allotments which tend to have the greatest number of conflicts and generally the greatest potential for improvement. Many Herd Management Areas (HMAs) managed by SFO overlap with Category I Allotments. BLM plans to continue monitoring efforts on these allotments to determine whether management objectives are being met under current management treatments, which depends on fencing. Management and/or grazing use levels maybe changed based upon results of these studies.

11.7 Impacts from Livestock Grazing

Comment Number: #8-9

Comment: Consider use of "Greater Modoc Area – A Strategic Plan for Elk Management" to provide more accurate assessment of impacts of alternatives. It discusses method for analyzing impacts to grazing when federal forage supply is changed of alternatives. Addresses key issues and preferred over IMPLAN model for analyzing socioeconomic impacts from grazing

Response: Within the limitations of the IMPLAN model, the economic analysis as presented is believed to provide an appropriate and useful comparison of the economic impacts from each of the alternatives, and therefore the existing analysis has been retained.

Comment Number: #25-5

Comment: Correction of resource degradation caused by domestic livestock and prevention of future degradation should be driving force behind RMP and reflected in NEPA document and future agency decisions regarding livestock grazing. Alt 2 meets objectives best but still falls short of restoring degraded conditions and meeting mandates.

Response: The purpose and need for the RMP is to provide overall management and long-term direction for the public lands and resources administered by BLM's Surprise Field Office, in accordance with FLPMA, as stated in Section 1.1. BLM appreciates the importance of environmental protection and acknowledges the challenges of balancing environmental protection with livestock grazing and economic use. We believe that our proposed grazing strategies are sufficient, and that our proposed approach provides this optimal balance. BLM's management focus since 2000 has been on meeting land health standards through development of grazing systems that allow vegetation to receive periodic rest, shortened periods of use, use deferment, and varied season of use. Our proposed approach also includes sufficient flexibility to make future adjustments as and where needed to address land health concerns.

Comment Number: #25-10, #25-17

Comment: SFO failed to take a "hard look" at impacts of domestic livestock grazing. Need to provide the underlying data that are the basis for professional opinions. Commenter cites statement from p. 4-77 (note this is from the impacts <u>on</u> livestock discussion) as being the only statement regarding the impacts to resources from domestic livestock.

Response: BLM is taking steps to look at the impacts of domestic livestock grazing, and under the proposed action will have the ability to make additional changes / adjustments on a variety of fronts where it is determined that livestock grazing is causing adverse impacts on other resources in the SFO planning area. Impacts from livestock grazing are addressed in Chapter 4 under each of the various resource areas that could be impacted by grazing (for example, vegetation or wildlife). For example, see revised Section 4.22.4.5. Please note that Section 4.8 presents the evaluation of impacts on livestock grazing from the proposed management actions.

Comment Number: #25-14

Comment: Any discussion of impacts should have addressed unwillingness of permittees to use peer-reviewed range science principles for management and their strong opposition to the most minimal standards of performance. Instead, rely on unfounded solutions such as time-controlled grazing and "holistic" management.

Response: We acknowledge your opinion; however, we do not believe this to be an accurate statement or relevant to the discussion of impacts. BLM considers a variety of grazing strategies and management options that comply with the Northeastern California and Northwestern Nevada Standards and Guidelines for Livestock Grazing; these guidelines offer both direction and flexibility for management and implementation. Management focus since 2000 has been on meeting land health standards through development of grazing systems that allow vegetation to receive periodic rest, shortened periods of use, use deferment, and varied seasonal use.

Comment Number: #25-15

Comment: Commenter cites studies regarding effects of different livestock grazing intensities on forage plant production, use of quantitative ecology in range management, etc., to make point that grazing during different seasons was less important than grazing intensity. Additional studies referenced on long-term stocking rate appear to show that under actual field conditions, light grazing (25% or less by livestock) is most appropriate to meet BLM's mandate for sustainable use. BLM should require at least minimum compliance with these standards in RMP until standards can be evaluated at site-specific level.

Response: We appreciate your comment and reference to additional studies. However, BLM will be implementing the Standards and Guidelines as directed by our grazing regulations (43 CFR 4180.2(c)). In accordance with these Standards and Guidelines, we would adjust livestock levels, as needed and appropriate, on a site-specific basis. As stated in the revised Section 2.8.5, review of existing permitted use-levels (AUMs) would be conducted on individual allotments through assessment of existing activity plans (allotment management plans or their functional equivalents, livestock grazing decisions, habitat management plans, watershed management plans, biological opinions, multiple-use decisions. Decisions regarding adjustments to existing levels of use, forage allocation, allotment boundaries, and changes to management level categories would be made at the activity plan level.

Comment Number: #25-16

Comment: BLM must show that benefits of domestic livestock grazing out-weigh the costs to comply with Multiple Use Sustained Yield Act (MUSYA). DEIS fails to disclose any of the direct, indirect, or cumulative impacts associated with domestic livestock grazing from proposed management direction under any of analyzed alternatives. DEIS analysis of impacts is less than 1/2 page on page 4-77.

Response: MUSYA does not apply to BLM; therefore, BLM is not required to include such a discussion in the RMP. Chapter 4 has been revised to include an improved discussion of direct, indirect, and cumulative impacts associated with domestic livestock grazing. In both the Draft EIS and this Final EIS, please note that impacts from livestock grazing are addressed in Chapter 4 under each of the various resource areas that could be impacted by grazing (for example, vegetation or wildlife). The section referenced by the commenter presents the evaluation of impacts on livestock grazing from the proposed management actions. See Chapter 4 of PRMP / FEIS.

11.8 Alternatives

Comment Number: #7-12

Comment: Exclude livestock from sensitive riparian areas via fencing or allotment cancellation.

Response: BLM SFO currently uses riparian fencing to protect riparian areas from livestock, where deemed appropriate, and will continue to construct riparian fencing on a site-specific basis where needed under the proposed action. Allotment cancellation is not an option available under BLM regulations.

Comment Number: #7-20

Comment: Support for Alternative 2 livestock/rotation system.

Response: Thank you for your comment. BLM's management focus since 2000 has been on meeting land health standards through development of grazing systems that allow vegetation to receive periodic rest, shortened periods of use, use deferment, and varied season of use. We believe that our proposed grazing strategies are sufficient, and that our proposed approach provides an optimal balance between economic use/livestock grazing and resource protection. Our proposed approach also includes sufficient flexibility to make future adjustments as and where needed to address land health concerns.

Comment Number: #8-10

Comment: Correctly analyze Alternative 2 grazing component which appears to lead to almost no grazing rather than the stated 2/3 reduction in grazing.

Response: Alternative 2 allows for 1/3 of grazing land to be, in any given year, actively used for 44% of the currently active amount of AUMs. The impacts from this alternative were analyzed accordingly.

Comment Number: #11-20

Comment: Contend that "grazing permittee…relinquishment" provision on page 2-42 should be removed since the Draft RMP explicitly recognizes that should such a process be initiated, BLM would complete a land use plan amendment.

Response: The above referenced statement "A grazing permittee may request voluntary relinquishment of grazing preference and permit for their BLM allotment, and thereby initiate action by BLM to allocate these AUMs for another use" is an informational BLM policy statement, and not a proposed management action. For this reason, the discussion on voluntary relinquishment of grazing preference and permit for a BLM allotment has been deleted from Section 2.8.5, and moved to Section 3.9.3.

Comment Number: #11-21

Comment: Reject preferred alternative relative to livestock grazing (page 2-44) to continue to authorize approximately 92,465 AUMs of livestock use annually since could be construed to mean that livestock use could not exceed this amount. Urge to rephrase statement that includes possibility for increased use if demonstrated by site-specific assessment.

Response: Thank you for your comment. The discussion of authorized AUMS has been clarified in Chapter 2.8.5 of the PRMP / FEIS, which now states: "Conversely, AUMs or livestock numbers may be temporarily increased or season-of-use extended, when forage production is above average. Long-term or permanent increases in grazing would be considered where land health standards have been met—or sustained, significant progress has been made—toward achieving those standards. However, increases must be based on a site-specific environmental assessment that confirms adequate and sustainable long-term forage production."

Comment Number: #14-36

Comment: There are no alternatives at the RMP decision level for livestock grazing. Clearly, grazing less than all the allotments is a reasonable alternative given that 31% of the evaluated areas are not meeting the Land Health Standards. This is a major flaw and in violation of the CEQ regulations.

Response: We believe that the alternatives identified and evaluated in the Draft EIS provided a reasonable range of management alternatives from which to make our decision. Alternative 2 in the Draft RMP contains several management actions that are vastly different from the other alternatives, including resting of all grazed lands 2 out of every 3 years. Under the preferred alternative / proposed action, we would prioritize adjustments to grazing strategies for allotments or areas where plant communities are at risk or show moderate departure from land health standards. The identification and evaluation of individual allotments is not appropriate for the level of detail appropriate to an RMP and the level of decisions that it supports. The actions in this PRMP / FEIS are designed to provide general management guidance in most cases. Decisions regarding specific allotments, such as changes to class of livestock authorized and future suitability of existing allotments for grazing, would be made at the activity plan level.

Comment Numbers: #14-37, #14-38

Comment: None of the livestock grazing alternatives meet the Planning Handbook H-1601-1 Appendix C requirement to identify both existing and future anticipated amount of forage available for livestock. None of the livestock grazing alternatives meet the Planning Handbook H-1601-1 Appendix C requirement to describe how "... public lands will be managed to become as productive as feasible for livestock grazing, including a description of possible grazing management practices."

Response: The PRMP / FEIS include several proposed management actions for livestock grazing (Section 2.8) and vegetation (Section 2.15) that would work towards restoring native plant communities, and hence make public lands as productive as feasible for livestock grazing. Management actions are also included for seedings managed for livestock forage. In addition, Section 2.8 outlines how changes in grazing systems and/or implementation of rangeland improvement practices would be used to meet land health standards, and sustain available livestock forage. Decisions regarding specific allotments—such as adjustments to existing levels of use, forage allocation, allotment boundaries, and changes to management level categories—would be made at the activity plan level.

Comment Number: #19-4

Comment: In preferred alternative for grazing, majority of proposed and considered ACECs remain open with few, if any, restrictions. Recommend BLM adopt grazing prescriptions of Alternative 2 into preferred alternative and include additional modifications to protect sensitive resources. Should also incorporate free use grazing permits in place of traditional lease agreements where maximum management flexibility is needed.

Response: BLM believes that current grazing strategies in the ACECs are sufficient, with ongoing protection management strategies including the use of monitoring data, and that grazing does not have to be further limited to one in three years as in Alternative 2. The preferred alternative has been modified to include a more detailed description of livestock grazing strategies presently used in ACECs, Section 2.11.5. Free use grazing permits are allowed only under specific conditions by BLM policy; it is also against BLM policy to cancel allotments.

Comment Number: #23-13

Comment: No Action Alternative does not mention Standards and Guidelines under the present land use plan decision.

Response: Compliance with the Approved Northeastern California and Northwestern Nevada Standards and Guidelines for Livestock Grazing was included in Section 2.8.5 Management Common to All Alternatives; this includes the No Action Alternative.

Comment Number: #23-14

Comment: Preferred Alternative must determine the Standard Operating Procedures that affect determination of carrying capacities and allocation of forage to ungulates. Species specific rangeland monitoring studies must be identified to deal with wild horses and pioneering elk.

Response: BLM has standard policies and regulations that it must use in determining allocation of forage. SFO monitors rangeland conditions as part of rangeland health assessments and riparian functional assessments. During these trend assessments and regular allotment visits, rangeland specialists, biologists and other staff members determine use and, if possible, where impacts are coming from and what can be done to correct any problems. The Standards for Rangeland Health require BLM to manage resources for wildlife, wild horses, and livestock and, together with other BLM-approved plans, allocate forage among users.

Comment Number: #24-16

Comment: Strong opposition to Alternative 2 which is essentially a "no graze" proposal. Proposal is unacceptable with respect to livestock grazing.

Response: Your preference has been noted. Thank you for your comment.

Comment Number: #25-6

Comment: Specific livestock grazing levels that will be used to meet standards are lacking in all alternatives and must be included in the Final EIS.

Response: The actions in this PRMP / FEIS are designed to provide general management guidance in most cases. Decisions regarding specific allotments—such as adjustments to existing levels of use, forage allocation, allotment boundaries, and changes to management level categories—would be made at the activity plan level. It is not possible to set grazing levels until a formal determination of land health has been made/completed. Such determinations have not yet been made for all allotments. These determinations will form the basis for setting livestock grazing levels in the SFO planning area. While completing these determinations is a priority for the SFO – and we have made good progress – it is a very intensive process. We do not expect to complete this work until 2009. Recommended grazing strategies and permitted use levels would be consistent with the approved Standards for Rangeland Health and Guidelines for Livestock Grazing Management in Northeastern California and Northwestern Nevada (Standards and Guidelines) (July 2000). These Standards and Guidelines are identified in Appendix B of the PRMP / FEIS.

Comment Number: #27-12

Comment: EIS and RMP must reduce livestock numbers in all alternatives.

Response: We believe that the alternatives identified and evaluated in the Draft EIS provided a reasonable range of management alternatives from which to make our decision. Under the preferred alternative / proposed action, we would prioritize adjustments to grazing strategies for allotments or areas where plant communities are at risk or show moderate departure from land health standards.

Comment Number: #31-4

Comment: As each alternative presents same number of AUMs, we fail to see how more than two alternatives have been provided, considering the annual reduction in Alt 2. If reasoning is that you need to adhere to AUMs in existing permits already reviewed, we suggest you are putting the cart before the horse. The RMP should guide the permits, not the reverse.

Response: We believe that we have analyzed a reasonable range of management alternatives relative to all resource areas. The actions in this PRMP / FEIS are designed to provide management guidance at the land use plan level. Decisions regarding specific allotments—such as adjustments to existing levels of use, forage allocation, allotment boundaries, and changes to management level categories—would be made at the activity plan level. It is not possible to set grazing levels until a formal determination of land health has been made/completed. Such determinations have not yet been made for all allotments. These determinations will form the basis for setting livestock grazing levels in the SFO planning area. While completing these determinations is a priority for the SFO – and we have made good progress – it is a very intensive process. We do not expect to complete this work until 2009. Recommended grazing strategies and permitted use levels would be consistent with the approved Standards for Rangeland Health and Guidelines for Livestock Grazing Management in Northeastern California and Northwestern Nevada (Standards and Guidelines) (July 2000). These Standards and Guidelines are identified in Appendix B of the PRMP / FEIS.

11.9 Affected Environment – Livestock Grazing

Comment Numbers: #8-6, #24-12, #26-19

Comment: Historical setting paragraph to be inaccurate. Grazing has been occurring on Surprise Valley landscape for over 150 years. History is also incomplete and portrays an unnecessarily derogatory image of grazing. Does not paint complete picture of livestock grazing for past 140 years. Commenter questions some of the assumptions and validity of statements in the Historical Setting for Livestock Grazing, page 3-9; provides details.

Response: Chapter 3.9.1 has been revised to better characterize the historical setting of livestock grazing.

Comment Number: #14-35

Comment: Opening discussion in livestock grazing (Section 2.8) belongs in Chapters 3 or 4.

Response: Thank you for your comment. However, we believe that the information provided is important for an understanding of the alternatives related to Livestock Grazing (as well as Chapter 2 text related to special area designations, vegetation, and wildlife); therefore, it has been retained in its current location.

11.10 General

Comment Number: #8-8

Comment: Requests language in RMP includes consideration of using re-acquired permits, whether voluntary or otherwise, for grass banks.

Response: Under the proposed action, management actions include establishing “forage reserves or ‘grass banks’ where feasible, in cooperation with federal, state, and private agencies, for conservation benefits and management flexibility, thus helping to maintain rangeland health standards. Forage reserves would facilitate juniper treatment and other rangeland improvements by providing alternative areas for livestock grazing. When a grazing permit is voluntarily retired, the allotment will be considered for use as a forage reserve.” This has been clarified in revised Chapter 2.8.5

Comment Number: #11-6

Comment: Estill does not oppose forestry and fuels management preferred alternatives, but encourages planners to recognize livestock grazing as an important tool to remove excess forage while producing a viable product (beef and lamb) which benefits local and national economies. For purpose of fire prevention, livestock grazing should be increased via Temporary Non-Renewable (TNR) increases in authorized grazing whenever we have an above average year in terms of rainfall and forage production.

Response: We believe that the preferred alternative includes the most appropriate mix of fuels management measures, including grazing (biological treatments), to adequately meet human safety needs and achieve resource objectives of the SFO. Hazardous fuels reduction plans will be developed in coordination with resource specialists, and will identify the appropriate treatment method for a specific site. Under the proposed action, current cattle grazing levels would continue at present level, at least initially, with future levels having the potential to increase or decrease based on final land health determinations.

Comment Number: #11-13

Comment: Reject notion, both factually and legally, that livestock grazing should be made compatible to other resources and resource uses, if compatible means "subordinate". Not defined in RMP.

Response: BLM SFO is charged with managing for multiple use and sustained yield. While these sometimes present conflicting challenges – such as where managing the uses of one resource for economic gain (e.g., livestock grazing) may conflict with another use targeting resource protection – we believe that our proposed action in the PRMP / FEIS provides the best balance to achieving these directives and is consistent with our intent to maximize resource use compatibility while avoiding any favoritism of one use over another. Under the preferred alternative, we take into account the grazing permittees preference in our determination of recreation activities. We would recognize any valid existing rights under a valid permit.

Comment Number: #11-15

Comment: Rejects provision that burned lands would be rested from livestock grazing for a minimum of 2 growing seasons; should rely on assessment process to determine suitable resting period.

Response: Our local information and data show that two growing seasons is the minimum resting period necessary for recovery of plants following fire, in order to meet land health conditions. In addition, plants must meet the ability to withstand grazing; this would be determined based on a site-specific assessment at the end of the two-year growing cycle.

Comment Number: #11-23

Comment: Reject condition applied on page 2-44: Field Manager should not be limited in ability to construct additional fencing so as to simultaneously satisfy livestock and other objectives.

Response: The proposed management action described on page 2-44 was not intended to limit fencing as a tool, only to minimize maintenance on exclosure fences.

Comment Number: #11-24

Comment: Reject condition (page 2-44): Field Manager should not be limited in ability to construct additional water development only where minimal impact on other resources would occur and wildlife would benefit. Development of water for purpose of better livestock distribution is a viable consideration.

Response: We agree that development of additional water sources can be a positive tool for improved livestock distribution; however, such development would require additional site-specific NEPA review, including analysis of impacts to other resources.

Comment Number: #11-29

Comment: Reject concept on page 3-53 that non-native annual brome grass species will never be completely eliminated from communities where they currently exist. Grazing can help here (if use levels above 60%). Draft RMP should be clarified to authorize field managers to increase use levels.

Response: As stated in Section 3.17.1.7, this persistence is attributable primarily to the ability of annual plants to produce seed every year, store many years of seed in surface litter and soil, and germinate earlier than the remaining perennial plants. The statement only indicates that the problem will persist, even if grazing were to be discontinued.

Comment Number: #11-32

Comment: Draft RMP fails to disclose locations where existing good conditions created by wheatgrass seedings would be maintained (not on maps either). Also, reject that existing poor condition seedings on one allotment would be restored to native species-dominated communities and would no longer be managed as seedings: the cost to restore such poor seedings to native would be prohibitive. A more efficient use of time and money would be to assess means to manage the existing seedings.

Response: The locations of the existing healthy and productive condition crested wheatgrass seedings (36,740 acres) can be viewed at the Surprise Field Office. The crested wheatgrass stands in poor condition (8,400 acres) will be restored to native vegetation by allowing the already existing native grasses within these stands to prosper; they will not generally be reseeded to native species.

Comment Number: #11-33

Comment: Document does not provide analysis for the basis for distinguishing between good and poor crested wheatgrass seedings, recommends considering 5 acres per AUM to be an excellent seeding and 5-10 acres per AUM to be a good seeding.

Response: Thank you for your comment. The assessments for rating the status of crested wheatgrass seedings were based on species composition, production for the site, and presence of noxious weeds and invasive species.

Comment Number: #20-6

Comment: FEIS should discuss monitoring to comply with Guideline 3 in Appendix C (periods of rest from grazing).

Response: Section 2.19.5 of the Proposed RMP outlines a variety of management actions (or BMPs) for restoring areas not meeting state standards, or on areas identified as having impaired water quality resulting from BLM's management. Theses protective measures would be developed on a site by site basis. Types of measures would include, but would not be limited to the following: development of new grazing management strategies, adjustment of AUMs or changing livestock season of use, gathering wild horses and/or adjusting AML herd numbers, restricting recreational activities, and protecting spring sources, wetlands, streams and uplands as needed from overuse by constructing and maintaining exclosures. Monitoring and or assessments would be completed during scheduled Range Land Health Assessments, Riparian Functional Assessments, and Water Quality Monitoring. A watershed map (Map WATER-1) with water quality monitoring stations, along with riparian functional assessment data, has been added to the PRMP / FEIS. In addition, the new drought policy "BLM Drought Management Policy for Alturas and Surprise Field Offices" will also impose reductions in livestock AUMs during years of drought.

Comment Number: #21-6

Comment: All large aspen stands should be excluded from livestock grazing whether they have been studied for significant wildlife value or not.

Response: The need to exclude large aspen stands will be considered on a site-specific basis; such stands would be fenced, as appropriate.

Comment Number: #21-9

Comment: Proper monitoring, surveys, and evaluations of grazing land will be needed to identify problems and to properly implement adaptive management programs, using accepted methodologies and conducted by objective investigators.

Response: Grazing activities under the proposed action will comply with the Northeastern California and Northwestern Nevada Standards and Guidelines for Livestock Grazing (July 2000). This will ensure that proper monitoring, surveys, and evaluations of grazing land are conducted by trained and objective investigators using accepted methodologies. See Appendix B of the PRMP / FEIS, which describes the land health assessment on-the-ground procedures and identifies the 17 land health indicators used in making an assessment.

Comment Number: #21-11

Comment: Land should be rested for a minimum of two growing seasons when reseeded or affected by fire or mechanical treatment.

Response: This rest period is consistent with BLM policy and management actions under the preferred alternative.

Comment Number: #21-12

Comment: All livestock salting sites should be at least 0.5 miles away from aspen groves, meadows, and riparian corridors.

Response: One of the proposed management actions in the PRMP / FEIS (Section 2.8.5) is to locate livestock salting sites 0.25 to 0.50 mile from riparian areas to discourage damage by livestock. We believe that a minimum 0.25 mile buffer is sufficient for most salting sites since they are relatively small.

Comment Number: #24-13

Comment: Interesting to note similarities between maps showing those allotments not yet meeting rangeland health standards and those maps showing the presence of wild horses (many above AMLs). Additional management emphasis should be placed on the interaction between livestock and wild horses. Damage to range and riparian resources as well as to range improvements such as fences should be closely analyzed before assessing blame and making grazing decisions.

Response: Since the implementation of the current Land Use Plan management emphasis has been on Category I (Improve) allotments which tend to have the greatest number of conflicts and generally the greatest potential for improvement. All Herd Management Areas (HMAs) managed by the Surprise Field office overlap with Category I Allotments. In the future, BLM plans to continue intensive monitoring efforts on these allotments to determine whether management objectives are being met under current management treatments, which is dependent on fencing. Management and/or grazing use levels maybe changed based upon results of these studies. See also response to comment #20-6.

Comment Number: #25-8

Comment: The DEIS states that the goal of the livestock grazing program is as follows: "Sustainable, ecologically sound, and economically viable livestock grazing opportunities would be provided, where suitable, in the SFO planning area," yet it fails to define what constitutes a sustainable and economically viable level of livestock grazing.

Response: A sustainable level of livestock would be defined if a particular area met all five of five standards of rangeland health, as outlined in Appendix B. The standards are expressions of physical and biological condition or degree of function required for healthy, sustainable rangelands. They relate to the capability or potential of a specific site; some standards may not apply to all acres.

Comment Number: #25-11

Comment: DEIS fails to scientifically and accurately determine those lands which are capable and suitable for livestock grazing.

Response: We have carried forward existing permitted AUMs within 49 allotments based on previous and ongoing assessments conducted to assess grazing allotment conditions and land health assessments. We will update / modify this information as we complete our standards evaluation and as land health conditions warrant. In the meantime, we would observe and conduct photo monitoring to ensure that the guidelines are being followed and capacity is not being exceeded. Where impacts from livestock are identified, SFO would make the necessary adjustments to livestock grazing activities with which the permittees would have to comply. All grazing activities would have to follow the Standards and Guidelines contained in Appendix B of the PRMP / FEIS. In particular, Guideline 17 of the Standards and Guidelines requires that rangeland monitoring be conducted to determine utilization of forage resources and trend of rangeland health in each allotment based on current accepted practices and techniques as directed in the Interagency Technical Reference: *Utilization Studies and Residual Measurements* and *Sampling Vegetation Attributes*.

Comment Number: #25-13

Comment: RMP fails to provide for long-term rest to facilitate recovery.

Response: In general, management focus since 2000 has been on meeting land health standards through development of grazing systems that allow vegetation to receive periodic rest, shortened periods of use, use deferment, and varied seasonal use. Specific prescriptions for rest would be provided on an allotment-specific basis based on site-specific issues.

Comment Number: #25-26

Comment: There is no disclosure as to the amount of range improvements in the form of vegetation treatments and conversions to non-native species.

Response: The SFO has implemented a number of range improvements in the planning area, in past years as necessary to facilitate improved grazing strategies. Additional improvements or enhancements may still be necessary for those allotments exhibiting moderate departure from land health standards or those areas “at risk”. Specific improvements are more appropriately identified and implemented on a site-specific basis and would include additional site-specific NEPA analysis prior to construction.

Comment Number: #25-36

Comment: FEIS should discuss whether or not proposed action complies with BLM National Sage-Grouse Habitat Conservation Strategy, USDI, November 2004.

Response: All proposed management actions within the Proposed RMP will follow guidance as provided from BLM’s *National Sage-Grouse Habitat Conservation Strategy* (2004), Conservation Strategy for Sage-Grouse (*Centrocercus urophasianus*) and Sagebrush Ecosystems within the Buffalo-Skedaddle Population Management Unit” (Northern California Sage-Grouse Working Group, 2006), and *Greater Sage-Grouse Conservation Plan for Nevada and Eastern California First Edition, June 30, 2004.*

Comment Number: #26-20

Comment: Observed (from looking at maps GRZ-1 and WHB-1) that those allotments that are moving toward but not yet meeting standards have horses on them. It would appear that damage done to the riparian of these allotments, which prevent them from meeting standards, could be possibly the result of wild horse use. Feel livestock industry has taken blame and financial loss due to the agencies and public's inability to properly manage wild horses. Raise a number of questions relating to lumping of use by livestock and wild horses, number of wild horses in relation to that prescribed, documented damage to riparian areas by wild horses, repaired fences torn up by wild horse, etc. BLM must manage its commitments in order to successfully meet riparian and utilization goals and standards.

Response: See individual responses below relating to specific questions raised in the comment:

Has livestock use and wild horse use been lumped together?

Wild horse grazing impacts are considered along with impacts from livestock in a multiple use context, however, during the allotment evaluation process, livestock and wild horse grazing use is normally divided on a percentage basis. Wild horse use is determined by using population estimates on a yearlong basis, unless seasonal distribution information is available. Livestock use is determined by actual use reports and field records by allotment, pasture, or use area basis. In a few instances, livestock or horse use can be separated if measured at variously times during the year. For example, in allotments with multiple pastures, utilization levels would be measured prior to livestock entering a pasture to determined utilization by wild horses; then livestock use would be measured when they are gathered from a pasture, and lastly utilization levels would be measured at the end of the year to determine additional wild horse use.

Has BLM documented damage done to riparian areas by wild horses?

We agree that partition of grazing use is important for determining cause and effect interactions. Monitoring information is analyzed and evaluated to determine what actions are necessary to make process toward meeting rangeland health standards, and are for establishing AMLs for wild horses.

Has BLM kept the horse numbers at levels prescribed?

BLM will continue to gather excess wild horses from HMAs to maintain the populations at the AMLs. As the commenter indicates, the timing of removal actions varies depending upon the availability of funding, labor, equipment, or contractors. Gathers are coordinated on a Bureau-wide basis, and within the past 15-20 years, most of the herds managed by the SFO have been over AML. Currently, 3 of 8 herds managed by the SFO are within AMLs; however, the BLM National Strategy Plan for wild horse management is to have all herds at AML by the end of 2007.

Has BLM maintained fences torn up by wild horses?

Generally, BLM has maintenance responsibility for exclosures in HMAs, and the permittees has maintenance responsibility for allotment and pasture fences. In most instances, BLM has maintained fences torn up by wild horses. However, we have found fence damage is caused by a variously reasons, and is not usually entirely contributed to wild horses.

Has BLM maintained their exclosures fences?

Exclosures are built for a variety of purposes. Recently, exclosures have been constructed to protect or enhance riparian values, particularly on those systems not meeting rangeland health standards. We believe improved riparian conditions ultimately benefit the livestock permittees. The SFO generally performs fence maintenance in HMAs, regardless of the circumstances that led to the degraded riparian conditions. Most of the higher priority riparian exclosures are inspected and maintained on annual basis, other exclosures are inspected less frequently.

Comment Number: #26-23

Comment: Request that sentence under 2.8.5 Management Common to All Alternatives about gates to water traps being left open be eliminated. In many cases, it is the wild horses that are damaging the riparian or other protected areas. This statement followed as a standard would create many time consuming and unnecessary management and enforcement situations that may defeat the reasons for the exclosures. This is a matter that should be dealt with in individual AMPs on a case-by-case basis and not as a standard.

Response: We believe the statement about water traps in Section 2.8.5 is appropriate for the management of livestock, wildlife, and wild horses. BLM defines water traps as: Exclosures around small stock reservoirs, windmills, or wells that provide water primarily for livestock, but are also used by wild horses and wildlife. Generally water traps occur along a pasture or allotment fence line with access from two sides; by opening and closing gates livestock grazing can be controlled or managed. The gates are opened in the off season, or winter, for the purpose of not trapping animals or for maintaining a free roaming feature in the wild horse herd management areas. Water traps are not associated with riparian exclosures or water gaps between exclosures. This definition has been added to the glossary.

Comment Number: #30-2, #35-15

Comment: BLM can and should close additional areas to livestock grazing. Grazing closures recommended in preferred alternative are minimal. Notes that 100% of SFO lands are open to grazing. Request that some areas be closed so that needs of grazing permittees are better balanced with need to conserve biological resources. Recommends areas to focus on.

Response: BLM's management focus since 2000 has been on meeting land health standards through development of grazing systems that allow vegetation to receive periodic rest, shortened periods of use, use deferment, and varied season of use. We believe that continuation of this strategy, in combination with other resource management actions included in the proposed action (e.g., designation of ACECs, protection of winter habitat for wildlife, T&E species habitat, etc.) provides an optimal balance between economic use/livestock grazing and resource protection. Our proposed approach also includes sufficient flexibility to make future adjustments as and where needed to address land health concerns.

Comment Number: #30-9

Comment: BLM should adopt new and stricter management prescriptions for livestock grazing, and implement the "Blueprint" strategy for protecting and restoring sage-grouse populations (C.E. Braun document).

Response: We appreciate the opportunity to review and consider additional guidelines in the development of management actions for sagebrush ecosystems and sage-grouse populations in the SFO planning area; we agree it is part of the updated standards and guidelines science. BLM staff make every effort to stay current with the various management strategies and prescriptions being implemented today, especially the more successful ones. We will consider adopting in the future some of the actions identified in the Blueprint that are appropriate for the SFO planning area. However, because we already have a Conservation Strategy for Sage-Grouse that is specific to our planning area, and therefore directly applicable to the existing sage-grouse population and sagebrush ecosystem conditions and concerns facing us, we are adopting guidelines from BLM's own Conservation Strategy for Sage-Grouse as our management protection measures under the proposed action (see Section 2.22 of the Proposed RMP Final EIS). We will continue to consider additional guidance, as appropriate and available, as we implement measures to bring us closer to full restoration, protection, and enhancement of this important species and its habitat.

Comment Number: #35-14

Comment: Concern regarding BLM EIS DES 03-62 regarding proposed revisions to grazing regulations for public lands, which commenter understands have been finalized. If BLM is actively implementing these policy changes, need to present discussion in description of preferred alternative and in management common to all alternatives. Also may be need to revise livestock grazing discussions in all appropriate sections of RMP/EIS to account for these changes in grazing policy.

Response: BLM will manage livestock grazing according to the most up-to-date policies and regulations. In regard to BLM EIS DES 03-62, Proposed Revisions to Grazing Regulations for Public Lands, the basic premise that requires BLM to manage livestock grazing to meet land health standards, has not changed. The new policy may create a change in how BLM implements decisions for grazing on a site-specific or allotment level. We believe that our language in the PRMP / FEIS is current in accordance with this policy.

Comment Number: #36-2

Comment: Monitoring has shown that livestock, especially cattle, must be excluded from surface waters if fecal coliform standards are to be met. Suggests that exclusion fencing be utilized extensively around surface waters, and that off-stream watering facilities be developed, rather than allowing direct access.

Response: We agree with the importance of excluding livestock from surface waters for the protection of water quality and will conduct water quality monitoring to assess site-specific conditions and identify causes where fecal coliform has exceeded state standards. Site-specific BMPs will be applied to correct the problem. The SFO will maintain 5,500 acres of existing livestock exclosures. An additional 2,000 acres of new livestock exclosures would be considered when no other practical or affordable options exist for mitigation of grazing effects. Whenever possible, existing infrastructure (pasture and allotment fences) or topography would be used to minimize construction of additional fencing, even if this increases the area from which livestock are excluded. The new exclosures would be required to mitigate livestock impacts on special habitats, water quality, and archaeological sites as a result of increased livestock distribution. Meadows and aspen stands of significant value to wildlife will receive priority for additional livestock exclusion. When fencing natural water sources, water would be provided outside exclosures for livestock, wildlife, and wild horses. Prescribed grazing may be allowed on these areas if needed to maintain vegetation vigor and diversity.

12.0 RECREATION AND VISITOR SERVICES

Comment Number: #2-1

Comment: Support for outdoor recreation and management (including wildlife and their habitat) that allows hunting and fishing; consider needs of hunters and fishermen.

Response: Thank you for your comment. We believe that the preferred alternative provides an optimal balance between public access for a multitude of recreational activities (including hunting and fishing) and resource protection.

Comment Number: #7-3

Comment: Request full protection of wilderness values for all additional roadless areas close to or greater than 1,000 acres.

Response: BLM believes the preferred alternative provides the optimal balance of motorized and non-motorized use in support of our multiple use objectives to accommodate the increasingly competitive recreational demands while ensuring the protection and long-term productivity of BLM-managed lands. Some routes are necessary within WSAs to allow BLM access to other areas to implement certain management activities. In accordance with BLM policy, only existing roads and ways (within WSAs) are allowed that were present at the time FLPMA was passed (1976) and later shown on, and/or described in, the 1979 Final Intensive Wilderness Inventory for Public Lands Administered by BLM-California outside the California Desert Conservation Area. Any new roads or trails that have been created or discovered since then have either been closed or should be closed to vehicle use in order to comply with the Wilderness Interim Management Policy (IMP). To adhere to this policy, 43 additional miles of routes within WSAs would be closed, as shown on Map TRAVEL-1. BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access.

Comment Number: #11-9

Comment: Commenter (Estill) does not oppose preferred alternative to establish the “Buckhorn Back Country Byway” as long as the Byway is properly and adequately noticed and signed as to road conditions, livestock use, etc., and as long as the Byway remains compatible with authorized livestock use.

Response: Establishment and use of the Buckhorn Back County Byway is considered to be compatible with grazing; signage would be provided only where a specific public need is identified.

Comment Number: #11-10

Comment: Commenter (Estill) opposes preferred alternative to establish various ROS zones within all 6 of his allotments to the extent that it intends and/or is interpreted and applied to limit/close any motorized access to facilitate the livestock operations upon the 6 allotments, particularly necessary at times to maintain range improvements and to manage the livestock.

Response: ROS classifications do not close routes or motorized access for authorized uses. Maintaining ongoing livestock operations by a permittee/landholder would be considered an authorized use.

Comment Numbers: #14-40

Comment: Recreation was identified as primary reason new RMP was needed so should be a priority. However, Planning Handbook H-1601-1 Appendix C requirement to identify SRMAs as not been adequately met. Saying SRMAs will be designated at some vaguely described location without map locations does not meet requirements of the Handbook.

Response: Alternative 2 in the Draft RMP EIS did identify SRMAs (although they were not mapped), which we believe demonstrates sufficient consideration. The option of developing future SRMAs however, should public recreation needs change, is included in the preferred alternative in Section 2.9.5 of the PRMP / FEIS: Future designation of special recreation management areas will remain an option, establishing new SRMAs in the future would require a plan amendment, if warranted by demand or the desire to strengthen local economies by promoting tourism. In this eventuality, other kinds of recreational development—such as back-country byways, interpretive sites, campgrounds, trails, and wildlife viewing areas could also be developed.

Comment Number: #18-15

Comment: BLM should not consider the establishment of a fee structure for visitors to the public lands.

Response: The emphasis of management actions within the preferred alternative is for extensive recreation opportunities throughout most of the SFO management area, which do not require a fee to visit or use these areas.

Comment Number: #19-90

Comment: BLM should carry Appendix H forward to the Final EIS/Proposed RMP and recognize at least some of the roadless areas identified as SPNM ROS zones in the preferred alternative ROS Map as areas with wilderness characteristics.

Response: Appendix J. Management of Lands with Wilderness Characteristics has been added to the SFO PRMP / FEIS. Map ROS-1 identifies those areas classified as SPNM (semi-primitive non-motorized). The SFO has previously identified and nominated areas that contain wilderness characteristics. These areas are currently in the status of wilderness study areas (WSAs). These WSAs contain approximately 105,000 acres of SPNM areas.

Comment Number: #19-105

Comment: Why is the primitive ROS class not “recognized” in SFO RMP (page 2-47)? No explanation is given and there appears to be no substantial difference in distribution of ROS classes between alternatives. This is a failure to offer a sufficient range of alternatives.

Response: The Recreation Opportunity Spectrum (ROS) is a tool used to manage recreational opportunities. There are six ROS classes, which are rated according to the outdoor setting in relation to motor vehicle access. The 'Primitive' ROS Class is characterized by a large-sized area, about 5,000 acres or more, lying at least three miles from the nearest point of motor vehicle access. The landscape therein is essentially unmodified, with little evidence of human presence. The ROS inventory for the SFO found no areas that meet these criteria for the 'Primitive' class. This is due in part to the extensive transportation network within the SFO.

Due to road closures (within WSAs) proposed to be implemented under the Preferred Alternative, ROS classes have become more restrictive than those for the No Action Alternative. 2242 acres would be managed as 'Semi-primitive Non-motorized' that were managed as 'Semi-primitive Motorized' under No Action. We believe that we identified and evaluated an adequate range of management alternatives for protecting lands with wilderness characteristics in the PRMP, and that our selection of the preferred alternative provides the best balance of public access and environmental protection.

Comment Number: #20-3

Comment: Ensure that the Guidelines in Appendix C are considered in monitoring efforts for project impacts. In particular, the FEIS should discuss monitoring to comply with Guideline 2 (ecological degradation from OHV use, including a monitoring timeline) and Guideline 14 (monitoring for utilization and impacts).

Response: Section 2.14.4 Travel Management references the Northeast California Resource Advisory Council Recommended Off-Highway-Vehicle Management Guidelines (listed in Appendix C) that will be used to monitor OHV use and degradation of natural or cultural resources.

Comment Number: #21-15

Comment: OHV use should be limited to designated routes and all OHV events should be routed away from conflicts with wildlife habitat.

Response: We agree with the commenter. Under the preferred alternative in the PRMP / FEIS, OHV use would be limited to designated routes and OHV events would be restricted to existing or designated roads and trails, and would be allowed only when consistent with protection of identified resources and other management objectives. See also discussion of OHV use in Section 2.14 on Travel Management.

Comment Number: #23-15

Comment: Unaware of any BLM campground or facility within influence of this plan in Nevada. We encourage the SFO to propose future campgrounds.

Response: The commenter is correct that there are no SFO managed campgrounds currently in Nevada. This was not identified in scoping as a need or issue to be addressed. However, to the extent that SFO's objective is to ensure that a wide range of developed and undeveloped recreational opportunities are sustained or created on its lands, BLM would consider developing new campgrounds in Nevada in response to an identified public need / increased demand for additional camping opportunities.

Comment Numbers: #26-26

Comment: Include Highway 299/8A wild horse herd viewing area near the California/Nevada state line east of Cedarville.

Response: This information has been added to Chapter 2.9.5 of the PRMP / FEIS: “Three seasonal wild horse viewing sites would be developed on Buckhorn Road in the vicinity of SOB Lake, on Lost Creek Road in the vicinity of Cottonwood Creek, and on Highway 299/8A near the California/Nevada border."

Comment Numbers: #26-27

Comment: Put positive spin on livestock on the range (could promote as a vestige of our western culture). Opportunity to see foraging on the open range with few fences is a unique opportunity for most of the people in U.S.

Response: Thank you for your suggestion of this potentially useful approach.

Comment Numbers: #26-28

Comment: Add information to the BLM kiosk at the mouth of Cedar Canyon west of Cedarville; it has been empty for many years.

Response: The kiosk located at Cedar Creek will be used by the Emigrant Trails Scenic Byway for historic trails interpretation, and information will be added to it.

Comment Numbers: #31-5

Comment: Increased recreational needs are emphasized at the beginning of the RMP, but the needs are fully analyzed. It does not identify special recreational uses based on need and resources.

Response: Chapter 1 of the Draft RMP lists all of the scoping issues raised by the public regarding recreational resources for the Alturas, Eagle Lake, and Surprise Field Offices. Not all of the scoping issues apply similarly to the Surprise Field Office Management Area and some were therefore dropped from further analysis and consideration in the Draft EIS.

Comment Numbers: #31-6

Comment: Various categories of recreation management acreage in alternatives 2, 3 and preferred alternative increase by less than 1%; alternatives are essentially the same.

Response: We agree that there is little difference between the alternatives with respect to recreation. No major public issues were identified during scoping relating to increased recreational facilities within the SFO and, as a result, differences between RMP alternatives reflected more a difference among other resource areas than a difference between recreation management approaches.

Comment Numbers: #31-7

Comment: Object to active promotion of tourism in Atlernative1 unless plans are presented in the RMPs to prevent impacts to other resources and uses.

Response: Your objection has been noted. Under the preferred alternative, future designation of special recreation management areas would remain an option only if warranted by demand or the desire to strengthen local economies by promoting tourism. Such designation would also require a plan amendment with accompanying environmental review.

13.0 SOCIAL AND ECONOMIC CONDITIONS

Comment Numbers: #8-9, #24-25

Comment: Consider use of "Greater Modoc Area – A Strategic Plan for Elk Management" to provide more accurate assessment of impacts of alternatives. It discusses method for analyzing impacts to grazing when federal forage supply is changed of alternatives. Addresses key issues and preferred over IMPLAN model for analyzing socioeconomic impacts from grazing. The IMPLAN model has flawed assumptions when used for estimating grazing impacts in NE California and NW Nevada; does not take into account that all available private forage is used every year. While County does not expect Alt 2 to be selected, a failure to accurately display true losses creates false impression that it would not be as economically devastating as it truly would be.

Response: Within the limitations of the IMPLAN model, the economic analysis as presented is believed to provide an appropriate and useful comparison of the economic impacts from each of the alternatives, and therefore the existing analysis has been retained. As clearly presented in the EIS, Alternative 2 stands in contrast to the other alternatives in that it is the only one resulting in a negative impact of any kind on employment and income. For these reasons, BLM has not selected Alternative 2 as part of the preferred alternative. Within the limitations of the IMPLAN model, the economic analysis as presented is believed to provide an appropriate and useful comparison of the economic impacts from each of the alternatives, and therefore the existing analysis has been retained.

Comment Number: #24-21

Comment: More current socioeconomic data should be used (2000-2001 used currently)

Response: The data that were used (which were the most readily available when the RMP / EIS process was started) are considered adequate for making decisions within the framework for this assessment, which covers a 15-20 year future planning period; therefore, the existing analysis was retained.

Comment Number: #24-22

Comment: The analysis does not address impacts on possessory interest tax levied on grazing permits. As it is collected on an "as used" basis, Alt 2 would directly impact county revenue.

Response: BLM acknowledges that Alternative 2 would have the impact on county revenue identified by the commenter. This impact has been added to the impact summary table at the end of Chapter 2.

Comment Number: #24-23

Comment: County has real concerns when economic model analysis uses Modoc, Lassen, and Washoe Counties and provides those comparisons by alternative in percentages. Lassen County's economy is primarily centered on prison business and impacts on resource uses hardly make a ripple. Portion of Washoe County that is part of the analysis could disappear and the county economy would not notice. Use of percentages to report changes tends to minimize the impacts.

Response: Percentages are only an indication of trends, but using the three-county area SFO encompasses is mandatory for proper analysis. BLM works very hard to minimize impacts on the local economy. Some of the proposed management actions would only slightly or not change regional economic activity.

Comment Number: #24-24

Comment: Alt 2 fails to capture true loss of grazing; it uses direct paper calculation of grazing 1 out of 3 years when in reality most grazers would cease to use their permit because of lack of forage the remaining two years.

Response: The analysis of Alternative 2 states that "In view of all these factors, the grazing program under Alternative 2 is likely to reduce livestock production and result in major effects or substantial financial impacts on all BLM permits. Eliminating BLM grazing capacity could also indirectly affect management of private lands as operators scale back or leave the livestock business." The intent of these statements is that BLM acknowledges a more direct overall impact to livestock operators than just losing forage every 2 years. For these reasons, BLM has not selected Alternative 2 as part of the preferred alternative.

Comment Number: #26-7

Comment: A true consideration of local economics seems to be lacking in this document.

Response: Throughout the planning process for this RMP numerous public meetings were held to illicit local input into the plan. One social and economic outreach workshop was held in Cedarville December of 2003. The workshop was focused on presenting economic data and working with the community members to arrive at a common understanding of the economic drivers of communities, local social values related to natural resources and places, community goals and vision, and the role of BLM in the community.

14.0 SOIL RESOURCES

Comment Number: #20-4

Comment: BLM should consider including buffer zones in riparian areas and restricting OHV travel in the proposed ACECs to reduce soil erosion.

Response: As stated in Chapter 2.10 of the PRMP / FEIS, the preferred alternative includes the construction of sediment intrusion buffer zones for ground disturbing projects to protect any type of water body adjacent to the project area (perennial or intermittent streams, ponds, reservoirs, lakes, wetlands, or springs). Regarding OHV travel, all OHV use would be limited to designated routes, including OHV use in ACECs, to protect surrounding resources and to minimize the potential for soil degradation. In addition, any necessary modifications to the designated route network would be the subject of a future project-level, site-specific NEPA analysis.

Comment Number: #20-5

Comment: FEIS should discuss monitoring to comply with Guideline 9 in Appendix C (soil erodibility from OHV use).

Response: OHV use would be confined to designated routes and routine monitoring would occur, particularly in special management areas such as ACECs and WSAs; or for special OHV large group events. BLM SFO law enforcement as well as other resource staff specialist regularly monitor and conduct ongoing assessments of selected areas within the planning area for resource damage from OHV use. For example, BLM checks key routes for seasonal conditions, closures and re-openings, and address site-specific problems as concerns are identified. New OHV regulations will reduce degradation to soils, vegetation, archaeological sites, wildlife habitat, and a myriad of other resource concerns by limiting OHVs to existing or designated roads and trails. Where monitoring identifies potential concern or damage to sensitive resources, management actions and best management practices including route closure or modification/realignment could be implemented, consistent with our adaptive management strategy as described in the introduction of Chapter 2. Other measures included in the proposed action to help minimize soil degradation include building roads and trails on only those soils which are considered unproductive and most suitable for construction; realignment of routes where they pass through unsuitable soils; limited OHV use, in areas with high shrink-swell soil characteristics, to periods when soils are dry and firm enough to resist compaction; and construction of any required route modifications in accordance with RMP goals and objectives to minimize damage to the watershed, soil and vegetation.

Comment Number: #23-16

Comment: The narrative for proposed management actions for soils refers to best management practices (BMPs). (BMPs usually refer to state water quality standards, and also Nevada BLM develops BMPs to mitigate and protect wildlife habitat.) Could not find soil-related BMPs in the text or appendix.

Response: BMPs are discussed in general terms; however, specific BMPs would be prescribed and implemented based upon site-specific conditions and requirements. BMPs will be monitored, evaluated, and modified as necessary through an iterative process to meet resource management objectives.

Comment Number: #25-16

Comment: BLM must show that benefits of domestic livestock grazing out-weigh the costs to comply with Multiple Use Sustained Yield Act (MUSYA). DEIS fails to disclose any of the direct, indirect, or cumulative impacts associated with domestic livestock grazing from proposed management direction under any of analyzed alternatives. DEIS analysis of impacts is less than 1/2 page on page 4-77 (reference to Livestock section of Ch. 4).

Response: MUSYA does not apply to BLM; therefore, BLM is not required to include such a discussion in the RMP. Chapter 4 has been revised to include an improved discussion of direct, indirect, and cumulative impacts associated with domestic livestock grazing. In both the Draft EIS and this Final EIS, please note that impacts from livestock grazing are addressed in Chapter 4 under each of the various resource areas that could be impacted by grazing (for example, vegetation or wildlife). The section referenced by the commenter presents the evaluation of impacts on livestock grazing from the proposed management actions. See Chapter 4 of PRMP / FEIS.

Comment Number: #25-27

Comment: DEIS fails to disclose any impacts that have resulted from already existing range improvements and impacts that will result from constructing even more (cites examples of impact to vegetation and soils).

Response: Impacts from existing range improvements were addressed in the previous EISs and the site-specific environmental assessments prior to project construction. Impacts resulting from existing range improvements are monitored by resource specialist during allotment compliance inspections, range improvement project inspections or during other trips to the field by resource specialist. When impacts resulting from existing improvements are preventing the achievement of land health standards, the activity or use causing the impact is identified and mitigation measures or BMPs are developed and implemented at the activity plan/project level. Impacts from new range improvements will be addressed at the site specific project level environmental assessment and during the project survey and design process.

Chapter 3 discussions (3.11) identify the soil conditions on allotments that have been assessed using Technical Reference 1734-6 “Interpreting Indicators of Rangeland Health” during BLM’s Land Health Assessments. The assessment is the process of estimating or judging the value or functional status of ecological processes (e.g., rangeland health) in a location at a moment in time. For soils two summary ratings, Soil/Site Stability and Hydrologic Function are assessed using the 12 indicators to determine if the soil is meeting the standard or not.

Chapter 4.11 includes disclosure of the potential for soil compaction around range improvements, including water developments for livestock, wild horses, and wildlife. Site specific impacts from improvements are examined at the project level, and are not included specifically in this RMP. However, all range improvements are monitored to ensure that they are improving resource conditions, as intended. Chapter 4 examines impacts from range improvements in general on vegetation, soils, and other resources. Chapter 4 also states that exclosures would have beneficial effects on riparian areas and temporary adverse effects on vegetation communities during construction, and that water developments would have minor and short-term effects during construction to livestock, wild horses and wildlife use. All range improvements projects must go through a site-specific environmental assessment prior to implementation. Some examples of direct benefits include the construction of additional water developments to improve livestock, wild horse and wildlife distribution, which would also favor enhancement and development of fish and wildlife habitats; and exclosures would be constructed to protect riparian ecosystems where necessary (see Chapter 2.21).

Comment Number: #26-29

Comment: Preferred soils alternative sounds good.

Response: Thank you for your support of the preferred alternative.

Comment Number: #34-12

Comment: Include explanation of "consumptive uses" in reference to soil resources (page 2-129, 3rd bullet).

Response: Consumptive uses are uses or activities that take soil out of production as a growing medium. Examples include soil used for road maintenance, recreational site development, or mining operations. This definition has been added to the glossary.

15.0 SPECIAL DESIGNATIONS – AREAS OF CRITICAL ENVIRONMENTAL CONCERN

This section is divided into the following subsections:

15.1 – Support for ACECs Recommended in Preferred Alternative
15.2 – Opposition to ACECs
15.3 – Support for Additional ACECs
15.4 – Land Use Restrictions in ACECs

15.1 Support for ACECs Recommended in Preferred Alternative

Comment Numbers: #1-7, #7-2, #19-51 , #19-53

Comments: Commenters variously strongly support designation of Massacre Bench and Bitner Ranch as ACECs; support all proposed ACECs and full protection of wilderness values in WSAs; support designation of the Bitner ACEC to protect cultural sites, rare and unusual plant assemblages, the Badger Creek riparian area, and other unique values; and support proposed designation of the Rahilly-Gravelly ACEC.

Response: BLM appreciates your support of the ACECs recommended in the preferred alternative.

15.2 Opposition to ACECs

Comment Numbers: #26-30

Comment: In general we oppose further ACEC designations; the current Black Rock/High Rock NCA started as an ACEC.

Response: Thank you for your comment. However, our decision to propose three new ACECs, which we believe offer one or more outstanding characteristics required for ACEC designation, is firm.

15.3 Support for Additional ACECs

Comment Numbers: #18-10, #18-11, #19-2, #19-5, #30-20

Comment: Some commenter's requested that that the acreage of the proposed ACECs be expanded and that other ACECs not identified in the Draft RMP EIS be considered, including the South Warner WSA aspen groves, a sage-grouse and sagebrush ecosystem ACEC and an old growth western juniper ACEC. Some commenters also requested additional data and a complete analysis that documents the decision not to designate those ACECs nominated (including external nominations) but not recommended for designation.

Response: In general, ACEC designation is based on whether or not a potential ACEC requires special management attention to protect unique resources in the selected plan alternative. ACEC designation requires a closer look at activities that occur in the area to ensure that they do not impact the primary values of the area. Management decisions are based on the most current information available, BLM policy, and existing laws. Areas that contain high-value resources or critical natural systems, processes, or hazards are eligible for consideration, if certain relevance and importance criteria are fulfilled. To meet these criteria, an area must contain significant historical, cultural, scenic, wildlife habitat, or other natural values. Furthermore, the site's importance—and potential for adverse effects on the protected resource—must extend beyond the local level. The suggested areas were not recommended for ACEC designation for the following reasons:

Aspen groves ACEC. After a careful review of our records, the SFO has not identified any external nominations for ACECs in the South Warner WSA for aspen stands. However, BLM acknowledges that aspen is a unique vegetative community and is a high management priority, and BLM is, in fact, taking specific steps for its protection and recovery. Examples of current management practices for aspen including fencing where necessary, rest from livestock after wildfire, and from wild horses when possible to prevent wild horse concentration. Livestock management changes have been made in aspen areas that include adjustments in the season of use. Also, recent juniper and conifer reduction has been shown to stimulate saplings, stabilization, and increase recovery and expansion of aspen (as well as riparian areas).

Sage grouse and sage grouse habitat ACEC. A sage-grouse and sage-grouse habitat ACEC was not selected for the following reasons. BLM agrees with the commenter that protection of this valuable habitat is important, however in order to warrant consideration for an ACEC, the resource must meet both the relevance and importance criteria outlined in BLM manual 1613 for ACEC's. While the greater sage-grouse does meet the relevance criteria for ACEC's it does not meet the significance values outlined under the importance criteria. In large part this is due to the fact that the entire field office is covered by three management plans based on population management units (PMUs) for sage-grouse (Buffalo-Skedaddle, Vya, and Massacre). These plans were formulated over several years and involved state and federal agency and landowner involvement. These PMUs have conservation goals, objectives, and associated actions outlined to guide conservation and management for sage-grouse and sagebrush ecosystems. Together with past management actions, these plans have contributed to intensive surveys for sage-grouse and contributed to funding for habitat projects specifically designed for sage-grouse. An objective of an ACEC is to highlight areas where special management is needed to protect and/or prevent irreparable damage to resources. These plans effectively do the same as an ACEC designation since such a designation would also require BLM to establish special management measures.

Old growth western juniper ACEC. An old growth western juniper ACEC was not designated because these areas are small and scattered throughout the planning area, and do not qualify as a regionally unique resource. However, BLM agrees that protection of native juniper woodlands is important due to their visual appeal, and biologic importance. Chapter 2.16, Vegetation, has been revised to reflect management actions specific to native juniper woodlands.

Regarding expanded acreage for currently recommended ACECs, BLM believes that the ACEC acreages as currently proposed are sufficient to protect the unique resources they are intended to protect.

15.4 Land Use Restrictions in ACECs

Comment Number: #14-41

Comment: It appears that minerals designations and the ACEC descriptions do not match.

Response: This inconsistency was actually corrected in the errata sheet that came out after issuance of the Draft RMP. The PRMP / FEIS has undergone a thorough review to ensure that acreages relative to minerals and ACECs are consistent.

Comment Number: #16-4

Comment: There are significant water resources that may be affected by this RMP, particularly as they affect Tuledad Creek, Wall Canyon Creek, Lost Creek, and some of the other streams that drain into the Duck Flat. The RMP and EIS should be revised to reflect Companies priority and vested rights to its water resources. All private land owners should not be prohibited, for example, from transporting its water from its property through public lands. The planning document should include a statement confirming in all of the proposed ACECs that right of way permits may be issued without additional restrictions.

Response: BLM does not dictate what occurs on private land and the rights of private landowners would continue regardless of adjacent land use designations. Owners of private land surrounded by public land (managed under the FLPMA) would be granted access across public land to permit reasonable use of their property. Rights-of-way established across public lands prior to the passage of the FLPMA would be recognized as a valid use. ACECs have been designated as such as per BLM policy to manage and protect unique and important resources, including cultural resources, scenic resources, sensitive vegetation, and important wildlife habitat. Due to the sensitive nature of these relevant and important resources, all ACECs have been designated as ROW avoidance areas. This means that any applications for new ROWs or utility corridors would undergo a site-specific NEPA review, and would only be granted if BLM concurs 1) the only feasible location is within the ACEC, and 2) no relevant and important resources would be adversely affected. It is incumbent on the ROW applicant to investigate and document that the only feasible location is within the ACEC. BLM will utilize the applicant's documentation to evaluate concurrence.
However, utility corridors included in the Western Regional Corridor Study (WRCS) will be available for right-of-way development, unless environmental analysis reveals the likelihood of significant adverse impacts on other resources.

Comment Number: #18-9

Comment: All three proposed ACECs should be closed to new vehicle rights-of-way.

Response: Under the proposed action, two ACECs (Massacre Rim and Rahilly Gravelly), a total of 45,827 acres, are designated as ROW avoidance areas. This means that any applications for new ROWs or utility corridors would undergo a site-specific NEPA review, and would only be granted if BLM concurs 1) the only feasible location is within the ACEC, and 2) no relevant and important resources would be adversely affected. It is incumbent on the ROW applicant to investigate and document that the only feasible location is within the ACEC. BLM will utilize the applicant's documentation to evaluate concurrence. In addition, the Bitner ACEC would also be closed to motorized travel. Motorized travel within the Massacre Rim ACEC and the Rahilly-Gravelly ACEC would be limited to designated routes and trails. Where ACECs and RNAs are "closed" to OHVs, or where use is "limited to designated routes," roads not available for motorized use would be marked (that is, signed "CLOSED"), physically blocked, or rehabilitated. Routine monitoring would also occur. We believe that the proposed OHV designations provide adequate protection and an optimal balance with recreational use. Section 2.11.5 has been revised to include new language regarding the ROW avoidance areas.

Comment Number: #19-50

Comment: Designate the 44,870-acre Massacre Rim ACEC; develop and implement specific grazing prescriptions for the ACEC; and, to protect sagebrush steppe and sage-grouse, adopt Alternative 2, closing the ACEC to locatable mineral entry.

Response: The proposed action includes designation of the 44,870-acre Massacre ACEC, entirely within the Massacre Rim WSA. Livestock grazing will continue within the Massacre ACEC, based on current permit stipulations and approved allotment management plans. BLM believes that current grazing strategies in the ACECs are sufficient, with proposed protection management strategies including the use of monitoring data, and specific grazing strategies (such as a rotational grazing system). Proposed changes to grazing—including duration and intensity of use—will be evaluated for likely impacts. Changes would be allowed only if they are not likely to have adverse effects on the relevant and important resources and values the ACEC was created to protect. A particular concern is destruction (by grazing and trampling) of cultural plants (plants used for traditional purposes by Native Americans) in and around springs. Where adverse effects are evident, livestock use will be adjusted. Typical methods would include additional fencing, reduced animal numbers, and/or season-of-use adjustments. In addition, each ACEC will require development of a management plan under the proposed action to appropriately manage resources; these plans would include additional grazing provisions and other stipulations to protect existing resources, including special status plants and wildlife habitat.

Mineral activities in the Massacre Rim ACEC are further constrained by the Wilderness IMP. The ACEC would be opened to locatable mineral activities (with stipulations to protect important resources), but would remain closed to leasable and saleable minerals. Note, however, that the potential for locatables is low, and that an approved plan of operations is required for locatable mineral development in a designated ACEC (except for recreational mining) to protect existing resources.

Comment Number: #19-52

Comment: Adopt Alternative 2, closing the Bitner ACEC to locatable mineral entry to protect the irreplaceable and important natural and cultural values.

Response: The Bitner ACEC would be open to locatable and saleable mineral activities, but open to leasable mineral activities with no surface occupancy (NSO) restrictions. Note, however, that the potential for locatables is low, and that an approved plan of operations is required for locatable mineral development in a designated ACEC (except for recreational mining) to ensure protection of existing resources.

Comment Number: #19-54

Comment: Request the consideration and adoption of an alternative that will close the Rahilly-Gravelly ACEC to saleable and mineral entry.

Response: The ACEC would be open to all mineral activities; however, leasable mineral development is subject to NSO stipulations. This designation and management approach is consistent with the preferred alternative in the Lakeview, Oregon Plan (Lakeview RMP, 2004). Designation of the Rahilly-Gravelly ACEC will create a combined ACEC/RNA between the two BLM offices of 19,468 total acres. Lakeview BLM will manage 18,511 acres under their jurisdiction, and Surprise BLM will manage 957 acres under their jurisdiction. Note also that the risk from saleable mineral entry is low, and that an approved plan of operations is required for locatable mineral development in a designated ACEC (except for recreational mining) to ensure protection of existing resources.

Comment Number: #19-55

Comment: Request that an alternative be considered and adopted that excluded ROWs from the Rahilly-Gravelly ACEC.

Response: The Rahilly-Gravelly ACEC is one of two ACECs that are designated as ROW avoidance areas. This means that any applications for new ROWs or utility corridors would undergo a site-specific NEPA review, and would only be granted if BLM concurs 1) the only feasible location is within the ACEC, and 2) no relevant and important resources would be adversely affected. It is incumbent on the ROW applicant to investigate and document that the only feasible location is within the ACEC. BLM will utilize the applicant's documentation to evaluate concurrence. Other site-specific measures would be included into the Rahilly-Gravelly ACEC management, as needed and appropriate, to further ensure protection of wildlife habitats and cultural sites; for example, restrictions would be placed within the ACEC to avoid disturbance of sage-grouse during breeding season and measures would be taken to preserve these and other habitats important to sage-grouse (see Section 2.11). This ACEC will also be designated a traditional cultural property for Native Americans.

Comment Number: #34-5

Comment: Recommend better protection of important resources in the ACECs by designating all ACECs as "closed to all mineral activity" (2.11.5, page 2-56).

Response: BLM believes that current management strategies relative to mineral activity offer sufficient protection of existing and important resources in ACEC, as indicated in responses to comments #19-50, #19-52, #19-54, and #19-55 above.

Comment Numbers: #35-16, #35-17, #35-18

Comment: Concerned that livestock grazing will be allowed in Rahilly-Gravelly ACEC/RNA and could negatively affect cultural plants in and around springs; this issue should be addressed in the EIS. (pages 2-62 and 2-63, Section 2.11.9). Rahilly-Gravelly ACEC/RNA: If livestock grazing is impacting cultural plants, recommend it be reduced or eliminated to address problem. Concerned that preferred alternative does not allow collecting of cultural plants. Could be at conflict with conserving some of these plants since they were tended by Native Americans and their populations are sustained through maintenance and harvest. Recommend BLM consider some of these approaches for this ACEC under the preferred alternative.

Response: BLM believes that current grazing strategies in the ACECs are sufficient, with proposed protection management strategies including close monitoring, by either the Lakeview BLM and/or SFO BLM, of the effects of grazing on cultural plants, especially those associated with springs. As stated in the revised Section 2.11.5 of the PRMP / FEIS, livestock grazing will continue within the Rahilly-Gravelly ACEC/RNA, based on current permit stipulations and approved allotment management plans. Proposed changes to grazing—including duration and intensity of use—will be evaluated for likely impacts. Changes would be allowed only if they are not likely to have adverse effects on the relevant and important resources and values the ACEC was created to protect. A particular concern is destruction (by grazing and trampling) of cultural plants (plants used for traditional purposes by Native Americans) in and around springs. Where adverse effects are evident, livestock use will be adjusted. Typical methods would include additional fencing, reduced animal numbers, and/or season-of-use adjustments. In addition, each ACEC requires the development of a management plan under the proposed action to appropriately manage resources. As part of the Rahilly-Gravelly ACEC Management Plan, a strategy will be developed to ensure protection of wildlife habitats and cultural sites. The ACEC will also be designated a traditional cultural property for Native Americans. Traditional Native American uses (and other concerns) within ACECs and RNAs would be identified and protected in consultation with tribal governments and native individuals. Tribes and (native) individuals would be allowed to collect whole plants or plant materials without a permit for recognized traditional uses.

16.0 SPECIAL DESIGNATIONS – WILD AND SCENIC RIVERS

Comment Numbers: #12-1, #18-13

Comment: Supports designation of all eligible river and stream segments in Draft RMPs. Recommend Wild and Scenic River status for all creeks and rivers identified as eligible in the Plan.

Response: Thank you for your comment. BLM also supports WSR designation for all river and stream segments identified as eligible in the Plan. However, none of the streams determined to be eligible for detailed evaluation (Rock Creek, Silver Creek, and Wall Canyon Creek) were found to meet the eligibility requirements for WSR status.

Comment Number: #12-2

Comment: Endorses ecosystem restoration alternative with respect to wild and scenic rivers because it maximizes river protection.

Response: Please note that our recommendations under the preferred alternative and the ecosystem restoration alternative for WSRs were identical in the Draft RMP.

Comment Numbers: #12-5, #18-12

Comment: Some ambiguous aspects regarding the suitability recommendation for Twelve Mile Creek (text says 2.2 mile segment but WSR map suggest that five or more miles are recommended (some by Lakeview Field Office?). Also a confusing discussion (pages 2-62 and 2-63) about the different roles of various field and state offices in the decision. Typo on page ES-7 stating that a 22-mile section is recommended. Surprise Draft RMP finds a small segment of Twelve Mile Creek eligible but language in document is ambiguous as to whether the Draft RMP is actually recommending the creek or not.

Response: We have reviewed the WSR map and find it to be correct. Note that the map shows the entire segment of 6.6 miles, including 4.4 miles in Oregon (BLM Lakeview Field Office) and the 2.2 miles found within SFO planning area. Chapter 2.9.5 has been revised and clearly identifies a management action under the preferred alternative as recommending to Congress that the 2.2 mile section (457 acres) of Twelvemile Creek be recommended to Congress for wild and scenic river designation with a "recreational" classification. The typographical error in the Executive Summary has been corrected.

Comment Numbers: #12-9, #18-14

Comment: Each Draft should, at a minimum, list every stream evaluated and why specific streams were rejected as ineligible. Wall Creek, which was not considered as eligible for WSR, should be reconsidered in the final plan and recommended. If not recommended, please provide better documentation for lack of consideration and non-recommendation.

Response: We agree and have added the SFO WSR suitability rationale to the PRMP / FEIS (Table H-1 in Appendix H), which lists 47 streams that were evaluated. This rationale includes the results of the further evaluation of three streams, including Wall Creek, for potential eligibility under the Wild and Scenic Rivers Act.

Comment Number: #19-66

Comment: Adopt proposal offered by preferred alternative to recommend that 2.2 miles of Twelve Mile Creek be designated as "recreational" segment under the Wild and Scenic Rivers Act.

Response: We have carried forth this proposal to the PRMP / FEIS.

17.0 SPECIAL DESIGNATIONS – WILDERNESS STUDY AREAS

This section is divided into the following subsections:

17.1 – General
17.2 – Routes Within WSAs
17.3 – Release of WSAs

17.1 General

Comment Number: #5-5

Comment: Nut Mountain Allotment 01010: Request that Bitner WSA and surrounding and bordering Massacre Lake be dropped or maintained as is (WSA) and not converted to a wilderness area, per DOI Secretary Luhan's 1991 review (attached) concluding that it did not qualify for a wilderness status.

Response: Designation of a WSA to wilderness or releasing an area from WSA status is a Congressional act and not a Field Office discretionary action.

Comment Numbers: #7-2, #18-7

Comment: Support all proposed ACECs and full protection of wilderness values in WSAs. Throughout planning process, BLM should include protection of lands with wilderness characteristics in the RMP's management alternatives.

Response: BLM is committed to protecting the physical integrity and wilderness character of WSAs until such time as Congress makes a determination regarding wilderness designation. We believe this commitment is reflected in our proposed management actions under the preferred alternative.

Comment Number: #16-1

Comment: Companies own property within Wall Canyon WSA. The WSA should not prohibit or restrict a private landowner from obtaining a right of way on public lands. The planning document in part confirms no visual impact specifically in Class I areas and the planning document is unclear as to whether pipelines, access roads, utility lines, and infrastructure will be impaired or jeopardized as a result of the WSA. If this is not the case, an expression of this intent should be incorporated by reference into the planning document. Use of private or public lands outside the Wilderness Areas should not be restricted because of the property's proximity to the Wilderness Area. If the existing wilderness study areas are managed with a visual resource management designation of Class I, requiring protection of scenic quality and other restrictions. If the existing wilderness study areas receive a wilderness classification, the visual resource management designation of Class I will remain, however, those restrictions should not impair existing or future uses on neighboring properties or future uses. We are concerned if a standard is adopted by BLM, which in effect, provides visual changes may be seen but should not attract the attention of the casual observer, this provision may prohibit or impair the Companies existing entitlements or future ability to access its property for personal and/or development purposes and/or obtain BLM right of way permits.

Response: BLM has no authority on private land and the rights of private landowners would continue regardless of adjacent land use designations. Owners of private land surrounded by public land (managed under the FLPMA) would be granted access across public land to permit reasonable use of their property. Rights-of-way established across public lands prior to the passage of the FLPMA would be recognized as a valid use.

Regarding VRM Class I designation, note that management of WSAs is governed by BLM's Interim Management Policy for Lands under Wilderness Review (IMP) until Congress makes a decision regarding wilderness designation. The IMP regulates that all WSAs be managed as VRM Class I.

Comment Numbers: #18-6, #19-89, #19-98

Comment: Urge BLM to include in final plan a commitment to maintain an ongoing inventory of lands to determine their wilderness qualifications. Support such inventory analysis for non-WSA lands as described in Draft RMP's Appendix I. To ensure wilderness values receive adequate emphasis, BLM must inventory for lands with wilderness characteristics (including those identified by citizens and proposed citizens' groups for wilderness protection). BLM should commit, in accordance with Section 202 of FLPMA to keep a continual and ongoing inventory of its lands to determine their wilderness characteristics. BLM should consider other management alternatives for protecting lands with wilderness characteristics and analyze this issue thoroughly throughout planning process. BLM must inventory for lands with wilderness characteristics (including those proposed by others), consider alternatives for protecting such lands, and address wilderness as separate and unique issues in planning process in each section of RMP. The guidance in Appendix I of Eagle Lake and Alturas should be included in Surprise RMP.

Response: Information from the 1990 California Statewide Wilderness Study Report (U.S. Bureau of Land Management 1990) and the 1991 Nevada BLM Statewide Wilderness Report (U.S. Bureau of Land Management 1991) is being brought forward into the PRMP / FEIS. The Surprise Field Office will continue to consider wilderness characteristics as part of the land use planning process consistent with guidance provided though BLM Washington Office direction. Given no external recommendations and the fact that we did not acquire land with wilderness characteristics, we believe that we identified and evaluated an adequate range of management alternatives for protecting lands with wilderness characteristics in the Draft RMP EIS, and that our selection of the preferred alternative provides the best balance of public access and environmental protection. The SFO is committed to maintaining an ongoing inventory and will continue to consider wilderness characteristics as part of the land use planning process consistent with Sections 201 and 202 of FLPMA and guidance provided through BLM Washington Office direction.

Comment Number: #19-67

Comment: General recommendation: BLM should propose management of WSAs that complies with IMP and protects wilderness character by limiting potentially damaging activities, applying protective management prescriptions, and proactively restoring and protecting their naturalness. (Provides detailed references to IMP).

Response: BLM's proposed management actions under the preferred alternative, as described in Section 2.13.5, are consistent with this recommendation.

Comment Number: #19-92

Comment: BLM should carry the VRM classification management for all five WSAs through to the Final document.

Response: Management of WSAs under VRM Class I objectives has been carried through under the preferred alternative in accordance with the Wilderness IMP.

Comment Number: #19-93

Comment: BLM should develop and adopt in the Final EIS/Proposed RMP an alternative that applies an ROS of "primitive" to all WSAs and carry this alternative forward.

Response: The Recreation Opportunity Spectrum (ROS) is a BLM tool used to manage recreational opportunities. There are six recreational opportunity classes, based on the outdoor setting in relation to motor vehicle access. The 'Primitive' rating is characterized by a large-sized area of about 5,000 acres or more, lying at least 3 miles from the nearest point of motor vehicle access, and it is essentially an unmodified landscape, with little evidence of others. Based on the results of the ROS inventory process, no areas were found within the SFO that meet the criteria for 'Primitive'. This is due primarily to the extensive transportation network within the management area.

We believe that we identified and evaluated an adequate range of management alternatives for protecting lands with wilderness characteristics in the Draft RMP EIS, and that our selection of the preferred alternative provides the best balance of public access and environmental protection. Please note that 2,242 acres that were originally rated as 'Semi-Primitive Motorized' in the no action alternative are now rated in the preferred alternative as 'Semi-primitive Non-Motorized', due the closure of several unauthorized routes within WSAs.

Comment Number: #19-97

Comment: BLM should consider designating new WSAs including areas identified by CWC during scoping in light of recent ruling re Utah settlement as interpreted by commenter.

Response: We believe that we identified and evaluated an adequate range of management alternatives for protecting lands with wilderness characteristics in the Draft RMP EIS, and that our selection of the preferred alternative provides the best balance of public access and environmental protection. BLM believes the preferred alternative represents an optimal balance of motorized and non-motorized use.

Comment Number: #24-17

Comment: County does not support that portion of preferred alternative that includes active pursuit of non-public lands adjacent to WSAs and only supports the pursuit of non-public lands within WSAs on a case-by-case basis. BLM's limited management resources should be focused on lands already owned.

Response: BLM does focus on management of lands already owned. Individual parcels within the SFO management area have not been specifically identified for acquisition or disposal. However, should parcels with high public resource value be offered by a (willing) seller, BLM would certainly receive and consider all such proposals on a case-by-case basis. Please also note that acquisition of private lands within WSAs is not required to protect wilderness characteristics of lands that were designated as WSAs through the 1979 inventory process. Although current land use plans do not specifically address acquisition of lands within WSAs, it is current BLM policy to respond to all acquisition opportunities through the Lands and Realty program, in support of all resources.

Comment Number: #26-36

Comment: Request that if Granger Canyon area becomes wilderness, the boundaries be defined to extend no further north than ½ miles south of the existing road easement corridor or be dropped from wilderness consideration altogether. Private road that passes through the area has been used to access private property, recreation purposes and to haul commercial logs and forest products out of Modoc National Forest.

Response: The Granger canyon parcel of The South Warner Contiguous WSA has a northern boundary of the existing Granger canyon road. Designation as wilderness would not impact access to and through Granger canyon. BLM does not restrict access to private parcels. Designation as wilderness is a Congressional act and not a Field Office discretionary action. Congress also decides upon the final boundary of any designated wilderness.

Comment Number: #26-37

Comment: If Bald Mountain area were made into wilderness it would most likely create a health and safety problem for the people of Eagleville and surrounding area since fire response equipment may need to use roads (area burned several times in past few years). Recommend this area be dropped as wilderness for safety reasons.

Response: Bald Mountain is in the South Warner Contiguous WSA. Designation of wilderness is a Congressional act and not a Field Office discretionary action. Removal of an area from a WSA designation is also a Congressional act. In addition, heavy equipment may be used on existing roads to fight fires in WSAs. During extended attack, retardant may also be used. Both of these situations require pre-approval by a line officer.

Comment Number: #26-38

Comment: The Buffalo Hills Corner of The Tuledad Allotment is crisscrossed with roads, fences, and other facilities (infrastructure important for livestock management) that do not make it compatible as wilderness. Request that this area be dropped from wilderness conservation.

Response: Designation of wilderness is a Congressional act and not a Field Office discretionary action. Removal of an area from a WSA designation is also a Congressional act.

Comment Number: #33-1

Comment: We would like consideration of removal of the area along County Road 40 that provides access to Emerson Campground and the South Warner Wilderness from designation as a WSA. There is need to provide improved access and parking along this road and BLM lands may provide an opportunity to better serve the public.

Response: The removal of areas designated as WSA is a Congressional act and not a Field Office discretionary action.

17.2 Routes within WSAs

Comment Number: #18-1

Comment: Concerned about routes that are designated, and whether any designation of routes is appropriate at all in the WSAs. Suggests that BLM either designate all WSAs as “closed, with the exception of existing routes and ways” – meaning only those routes that existed at the time the WSA was designated; or designate the routes you prefer to keep open to vehicle traffic as “temporary routes” to underscore the temporary nature of the routes and the designations.

Response: Routes shown on Map OHV-1 are authorized routes. The routes that would remain open within WSAs were identified by BLM through the wilderness inventory process in 1979 (Final Intensive Wilderness Inventory of Public Lands Administered by BLM-California outside the California Desert Conservation Area, December 1979). These routes continue to be managed for recreation access to primitive areas, and to allow access to private inholdings. Roads created after the wilderness inventory would be closed and rehabilitated in compliance with the Wilderness IMP. Motorized travel within the Massacre Rim, Sheldon Contiguous, South Warner contiguous, and Wall Canyon WSAs would be ‘Limited to Designated Routes’ – except in the SFO portion of the Buffalo Hills WSA. This area would be ‘Closed’ to motorized travel. If a WSA is denied wilderness status and returned to multiple-use management, it would be managed under the direction of this PRMP in a manner similar to the surrounding area or under a special designation (such as ACEC), if applicable.

The ‘Limited to Existing Roads and Trails’ designation is the official minimum standard for a WSA. We believe that the proposed designations are appropriate, and that the use of these routes within designated WSAs, as specified under the preferred alternative, represents an optimal balance of motorized and non-motorized use. Also note that BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access.

Comment Number: #18-2

Comment: Commenter cautions against giving vehicle travel routes in WSAs the title of “roads” whether they are designated or not, because BLM’s own definition of road implies a constructed, permanent, maintained, and graded facility, which conflicts directly with the intent of the Wilderness Act, FLPMA, and the IMP.

Response: For the purpose of the RMP, BLM has chosen to use both "roads" and "routes" as a means of distinguishing trails used by motorized traffic. The majority of the roads and routes within the SFO management area are not permanently maintained or graded.

Comment Number: #18-3

Comment: Urge BLM to recommend closure of all routes that were not in existence when the WSAs were designated and the initial inventory maps made.

Response: The Wilderness IMP limits OHVs to existing (or designated) roads and trails Roads created after the wilderness inventory (1979) would be closed and rehabilitated in compliance with the Wilderness IMP. Note also that BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access. An inventory was conducted in 2003 identify unauthorized routes; following the updated inventory, actions have been taken to close these routes.

Comment Number: #18-4

Comment: For the Massacre Rim and Wall Canyon WSA, commenter notes that maps in the Sept 2000 "Nevada Wilderness Study Areas notebook" show only minimal small vehicle routes entering these WSAs for a short distance. BLM's decisions for any route designations within WSAs should be documented via maps and/or photos from time of designation.

Response: In determining which roads and routes needed to be closed within WSAs, the Surprise Field Office used the original WSA inventory maps from 1987 as the baseline data for road and route information. The baseline data was then compared to the 2003 road inventory (cadastral survey) data to determine which new roads and routes needed to be obliterated within the WSAs.

Comment Number: #18-5

Comment: Where illegal routes within a WSA are identified, BLM should make every possible effort to restore and rehabilitate these.

Response: BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access.

Comment Number: #19-91

Comment: At minimum, BLM must provide the public with documentation of routes it designates within WSAs to prove that these routes were in existence prior to WSA designation and to prove these routes are not currently and will not in the future degrade a WSA's ability to be designated as wilderness. If BLM cannot prove that road existed prior to WSA designation or that its continued use does not degrade the wilderness character of a WSA, the route must be closed.

Response: In determining which roads and routes needed to be closed within WSAs, the Surprise Field Office used the original WSA inventory maps from 1987 as the baseline data for road and route information. The baseline data was then compared to the 2003 road inventory (cadastral survey) data to determine which new roads and routes needed to be obliterated within the WSAs.

Comment Number: #19-94

Comment: If BLM cannot prove that route existed prior to WSA designation and route's continued use does not impair the wilderness character of the area, BLM must develop and adopt in the final plan an alternative that close these routes and carry it forward.

Response: BLM's preferred alternative is in compliance with the Wilderness IMP and therefore consistent with the approach in this comment. Under the preferred alternative, BLM would close routes that did not exist prior to the WSA designation (that is, were not identified by BLM through the wilderness inventory process in 1979), and/or whose continued use was determined to impair the wilderness character of the area. Unauthorized roads and trails created or discovered since that time would be closed and rehabilitated, in compliance with the Wilderness IMP. BLM believes that the use of existing routes or "existing ways" within designated WSAs (that is, those routes present prior to the passage of FLPMA in October 1976), as specified under the preferred alternative, represent an optimal balance of motorized and non-motorized use. We believe that the preferred alternative provides best balance of public access and environmental protection with respect to managing wilderness characteristics.

Comment Number: #32-1

Comment: It's a mistake to designate routes within the WSAs and map them. Formal designation of routes could mean wilderness quality of the WSA could be impaired and no longer suitable for the wilderness designation, and would be a violation of FLPMA.

Response: BLM is required by federal law (Executive Order 116444 as amended) to designate all areas and trails for off road vehicle use or restrictions. Where limits on motorized OHV use are needed to protect public lands, BLM can take action under the existing land-use planning process to limit or restrict motorized OHV use. These decisions can be: site specific, limiting use to specific ways; seasonal, limiting use to a certain time of the year; or other, by type of vehicle, number of participants or particulars, etc. To protect areas where resources are at risk, BLM can designate areas or roads, trails, or ways as closed to motorized OHV use.

In determining which roads and routes needed to be closed within WSAs, the Surprise Field Office used the original WSA inventory maps from 1987 as the baseline data for road and route information. The baseline data was then compared to the 2003 road inventory (cadastral survey) data to determine which new roads and routes needed to be obliterated within the WSAs.

17.3 Release of WSAs

Comment Numbers: #18-8, #19-88

Comment: Should Congress choose to release any areas from WSA status, recommend that Surprise RMP provide some specific measures for their continued protective management: VRM classification, ORV route designation, and energy and mineral designations should receive consideration with a strong focus on the need to supply protective measures. In general, support WSA management common to all alternatives (pages 2-66 through 2-69). However, would prefer that management prescriptions be more specific in event any lands are released by Congress from WSA designation. Specifically, VRM classification, ORV designation, and energy and mineral designations should be addressed with strong consideration given to applying protective measures.

Response: Should any areas be released from WSA status, BLM believes that they would be protected through the following measures that are already in place under the proposed action: OHV use would be 'Limited to Designated Routes'; new energy or minerals development would require additional project- and site-specific NEPA reviews with the potential for more restrictive stipulations; and management under VRM class similar to the surrounding area, many of which are Class II (see also discussion in Section 2.13 of PRMP / FEIS). In addition, under the preferred alternative, BLM would actively pursue acquisition, from willing landowners of non-public lands within and adjacent to WSAs, and assess these lands for wilderness values; an amendment to the RMP would be completed to permit management under the Wilderness IMP.

Comment Number: #26-30

Comment: In general we oppose further ACEC designations, the current Black Rock/High Rock NCA started as an ACEC. The WSAs were just that, study areas, not wilderness; they were studied and BLM recommended those areas that met the criteria for wilderness many years ago! We request this document recommend release all WSA's with perhaps the exception of the Massacre Rim.

Response: Regarding WSAs, WSA designation is a Congressional decision, and is not discretionary to the local field office. This comment is beyond the scope of BLM's decision making authority as documented in this PRMP / FEIS.

Comment Numbers: #26-12, #26-30, #26-31, #26-35

Comment: WSA are only study areas that should have been released years ago as they were not recommended for wilderness areas (2.3.3.3 and 2.3.3.8). Oppose further ACEC designations in general. Request that the RMP recommend release of all WSAs with perhaps the exception of Massacre Rim. If SFO makes a recommendation that 2.2 miles of Twelve Mile Creek become a wild and scenic river, then we request BLM to recommend that all WSAs in SFO be released except Massacre Rim. We are asking SFO BLM to release WSAs and not make into wilderness under this Plan.

Response: WSA designation is a Congressional decision, and is not discretionary to the local field office. This comment is beyond the scope of BLM's decision making authority as documented in this PRMP / FEIS.

18.0 TRAVEL MANAGEMENT

This section is divided into the following subsections:

18.1 – Requests for Additional Closures and Restrictions
18.2 – Requests for Additional Trails, Routes, and OHV Areas
18.3 – WSAs
18.4 – General

18.1 Requests for Additional Closures and Restrictions

Comment Number: #7-3

Comment: Request full protection of wilderness values for all additional roadless areas close to or greater than 1,00 (presume commenter means 1,000) acres.

Response: BLM believes the preferred alternative provides the optimal balance of motorized and non-motorized use in support of our multiple use objectives to accommodate the increasingly competitive recreational demands while ensuring the protection and long-term productivity of BLM-managed lands. Some routes are necessary within WSAs to allow BLM access to other areas to implement certain management activities. In accordance with BLM policy, only existing roads and ways (within WSAs) are allowed that were present at the time FLPMA was passed (1976) and later shown on, and/or described in, the 1979 Final Intensive Wilderness Inventory for Public Lands Administered by BLM-California outside the California Desert Conservation Area. Any new roads or trails that have been created or discovered since then have either been closed or should be closed to vehicle use in order to comply with the Wilderness Interim Management Policy (IMP). To adhere to this policy, 43 additional miles of routes within WSAs would be closed, as shown on Map TRAVEL-1. BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access.

Comment Number: #7-7

Comment: Emphasize protection of roadless areas from road incursions

Response: The SFO does not manage any “roadless” areas per se. Section 2.14.4 of the Proposed RMP EIS emphasizes reevaluation of roads which may result in the closure of routes which are sensitive to resource damage, hazards to the public or duplicate routes.

Comment Number: #7-23

Comment: Support Alt 2 road closures or more and decomissioning of non-essential roads if possible.

Response: Thank you for your comment. We believe that our preferred alternative provides the best balance between public and administrative access and resource protection. Section 2.14.4 of the Proposed RMP EIS emphasizes reevaluation of roads which may result in the closure of routes which are sensitive to resource damage, hazards to the public or duplicate routes.

Comment Number: #18-9

Comment: All three proposed ACECs should be closed to new vehicle rights-of-way.

Response: Under the proposed action, two ACECs (Massacre Rim and Rahilly Gravelly), a total of 45,827 acres, are designated as ROW avoidance areas. This means that any applications for new ROWs or utility corridors would undergo a site-specific NEPA review, and would only be granted if BLM concurs 1) the only feasible location is within the ACEC, and 2) no relevant and important resources would be adversely affected. It is incumbent on the ROW applicant to investigate and document that the only feasible location is within the ACEC. BLM will utilize the applicant's documentation to evaluate concurrence. In addition, the Bitner ACEC would also be closed to motorized travel. Motorized travel within the Massacre Rim ACEC and the Rahilly-Gravelly ACEC would be limited to designated routes and trails. Where ACECs and RNAs are "closed" to OHVs, or where use is "limited to designated routes," roads not available for motorized use would be marked (that is, signed "Closed"), physically blocked, or rehabilitated. Routine monitoring would also occur. We believe that the proposed OHV designations provide adequate protection and an optimal balance with recreational use. Section 2.11.5 has been revised to include new language regarding the ROW avoidance areas.

Comment Number: #32-2

Comment: Support closure and reclamation of routes which have adverse effects on watersheds or wildlife.

Response: We agree with the importance of protecting watersheds and wildlife through route reclamation and closure and believe that our proposed management actions will provide such protection.

Comment Number: #35-2

Comment: Encourage BLM to close and eliminate duplicate or parallel roads to greatest extent possible and restore closed roads to native habitat appropriate to site, to greatest extent possible.

Response: BLM agrees and believes that our preferred alternative is consistent with this approach.

Comment Number: #35-20

Comment: Given concerns of BLM's limited budget to monitor and enforce patrols over large area, consider closing additional portions of SFO land base to OHV travel (suggest 22 specific areas for closure).

Response: We appreciate commenter's concern regarding enforcement of OHV travel and agree that our enforcement capabilities are limited due to budget constraints and the large acreage to be managed within the SFO management area. In reviewing the 22 areas identified in the comment, we note that the areas match those included in Alternative 2 (Ecosystem Alternative), which we have evaluated. We believe that our preferred alternative provides the best balance between public and administrative access and resource protection. In general we believe that by going to a designated route system, there will be a huge reduction in the amount of off-road use that occurs on BLM administered lands. In addition, no routes within designated ACECs have been identified as needing closure to protect wildlife; however this issue will be examined as the individual ACEC management plans are developed; and no other important wildlife habitat areas were identified as needing route closures to protect habitat. However, Chapter 2.14 Travel Management has been revised to state "*Routes would be maintained, modified, created, or obliterated in order to meet land health standards, water quality standards, wildlife habitat needs, and changing public needs and desires*."

18.2 Requests for Additional Trails, Routes, and OHV Areas

Comment Number: #24-19

Comment: In preferred alternative, an intensive OHV area should be developed without waiting to see if demand arises. With the loss of off road use, the public will want an option immediately available.

Response: We believe that our preferred alternative provides the best balance between public and administrative access and resource protection.

Comment Number: #29-4

Comment: Surprise Valley Draft RMP/EIS does not propose any specific new non-motorized trails and/or illustrate existing non-motorized trails. RMP should model the Recreation and Visitor Services and Travel Management sections of the Alturas and Eagle Lake RMP EISs.

Response: Currently there are no non-motorized trails with the SFO management area and our Recreation and Travel Management is unique. Therefore the model used for the Alturas and Eagle Lake RMP EIS would no be appropriate for the Surprise EIS.

18.3 WSAs

Comment Number: #3-2

Comment: Commenter is against designation of routes within WSAs, states this would be inconsistent with intent of Congress as declared by Wilderness Act, with FLPMA, and with BLM's own management guidelines as stated in IMP. Commenter offers recommendations to address their concerns, including minimum of restricting OHV travel to existing routes and trails within all WSAs and that none of these routes be formally designated.

Response: BLM believes the preferred alternative provides the optimal balance of motorized and non-motorized use in support of our multiple use objectives to accommodate the increasingly competitive recreational demands while ensuring the protection and long-term productivity of BLM-managed lands. Some routes are necessary within WSAs to allow BLM access to other areas to implement certain management activities.

In accordance with BLM policy, only existing roads and ways (within WSAs) are allowed that were present at the time FLPMA was passed (1976) and later shown on, and/or described in, the 1979 Final Intensive Wilderness Inventory for Public Lands Administered by BLM-California outside the California Desert Conservation Area. BLM has not added any new routes to the WSAs. BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access.

Comment Number: #3-3

Comment: Wants BLM to expand recommended closures to include all routes that were not in existence when the WSAs were designated. Also wants proof in the form of maps (from date of designation or aerial photos from time of designation) to support BLM's decision.

Response: See responses to Comments #18-3 and #19-91 below.

Comment Number: #18-1

Comment: Concerned about routes that are designated, and whether any designation of routes is appropriate at all in the WSAs. Suggests that BLM either designate all WSAs as "closed, with the exception of existing routes and ways" – meaning only those routes that existed at the time the WSA was designated; or designate the routes you prefer to keep open to vehicle traffic as "temporary routes" to underscore the temporary nature of the routes and the designations.

Response: Routes shown on Map TRAVEL-1 are authorized routes. The routes that remain open within WSAs were identified by BLM through the wilderness inventory process in 1979 (Final Intensive Wilderness Inventory of Public Lands Administered by BLM-California outside the California Desert Conservation Area, December 1979). These routes continue to be managed for recreation access to primitive areas, and to allow access to private inholdings. Roads created after the wilderness inventory would be closed and rehabilitated in compliance with the Wilderness IMP. Motorized travel within the Massacre Rim, Sheldon Contiguous, South Warner contiguous, and Wall Canyon WSAs would be limited to designated roads and trails. The portion of the Buffalo Hills WSA would be closed to motorized travel. If a WSA is denied wilderness status and returned to multiple-use management, it would be managed under the direction of this RMP in a manner similar to the surrounding area or under a special designation (such as ACEC), if applicable. The LE (limited to existing roads and trails) designation is the official minimum standard for a WSA. We believe that the proposed designations are appropriate, and that the use of these routes within designated WSAs, as specified under the preferred alternative, represents an optimal balance of motorized and non-motorized use. Also note that BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access.

Comment Number: #18-2

Comment: Commenter cautions against giving vehicle travel routes in WSAs the title of "roads" whether they are designated or not, because BLM's own definition of road implies a constructed, permanent, maintained, and graded facility, which conflicts directly with the intent of the Wilderness Act, FLPMA, and the IMP.

Response: For the purpose of the RMP, BLM has chosen to use both "roads" and "routes" as a means of distinguishing trails used by motorized traffic. The majority of the roads and routes within the SFO management area are not permanently maintained or graded.

Comment Number: #18-3

Comment: Urge BLM to recommend closure of all routes that were not in existence when the WSAs were designated and the initial inventory maps made.

Response: The Wilderness IMP limits OHVs to existing (or designated) roads and trails Roads created after the wilderness inventory (1979) would be closed and rehabilitated in compliance with the Wilderness IMP. Note also that BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access. An inventory was conducted in 2003 to identify unauthorized routes; following the updated inventory, actions were taken to close these routes.

Comment Number: #18-4

Comment: For the Massacre Rim and Wall Canyon WSA, commenter notes that maps in the Sept 2000 “Nevada Wilderness Study Areas notebook” show only minimal small vehicle routes entering these WSAs for a short distance. BLM’s decisions for any route designations within WSAs should be documented via maps and/or photos from time of designation.

Response: In determining which roads and routes needed to be closed within WSAs, the Surprise Field Office used the original WSA inventory maps from 1987 as the baseline data for road and route information. The baseline data was then compared to the 2003 road inventory (cadastral survey) data to determine which new roads and routes needed to be obliterated within the WSAs.

Comment Number: #18-5

Comment: Where illegal routes within a WSA are identified, BLM should make every possible effort to restore and rehabilitate these.

Response: BLM rangers routinely monitor the WSAs for unauthorized routes to address route proliferation, and route closure is an ongoing process in terms of the need to physically place rocks, brush, and seed (in some instances) to close off access.

Comment Numbers: #18-8, #19-88

Comment: Should Congress choose to release any areas from WSA status, recommend that Surprise RMP provide some specific measures for their continued protective management: VRM classification, ORV route designation, and energy and mineral designations should receive consideration with a strong focus on the need to supply protective measures. In general, support WSA management common to all alternatives (pages 2-66 through 2-69). However, would prefer that management prescriptions be more specific in event any lands are released by Congress from WSA designation. Specifically, VRM classification, ORV designation, and energy and mineral designations should be addressed with strong consideration given to applying protective measures.

Response: Should any areas be released from WSA status, BLM believes that they would be protected through the following measures that are already in place under the proposed action: OHV use would be limited to designated routes; new energy or minerals development would require additional project- and site-specific NEPA reviews with the potential for more restrictive stipulations; and management under VRM class similar to the surrounding area, many of which are Class II (see also discussion in Section 2.13 of PRMP / FEIS). In addition, under the preferred alternative, BLM would actively pursue acquisition, from willing landowners of non-public lands within and adjacent to WSAs, and assess these lands for wilderness values; an amendment to the RMP would be completed to permit management under the Wilderness IMP.

Comment Number: #19-91

Comment: At minimum, BLM must provide the public with documentation of routes it designates within WSAs to prove that these routes were in existence prior to WSA designation and to prove these routes are not currently and will not in the future degrade a WSA's ability to be designated as wilderness. If BLM cannot prove that road existed prior to WSA designation or that its continued use does not degrade the wilderness character of a WSA, the route must be closed.

Response: In determining which roads and routes needed to be closed within WSAs, the Surprise Field Office used the original WSA inventory maps from 1979 as the baseline data for road and route information. The baseline data was then compared to the 2003 road inventory (cadastral survey) data to determine which new roads and routes needed to be obliterated within the WSAs.

Comment Number: #19-94

Comment: If BLM cannot prove that route existed prior to WSA designation and route's continued use does not impair the wilderness character of the area, BLM must develop and adopt in the final plan an alternative that close these routes and carry it forward.

Response: BLM's preferred alternative is in compliance with the Wilderness IMP and therefore consistent with the approach in this comment. Under the preferred alternative, BLM would close routes that did not exist prior to the WSA designation (that is, were not identified by BLM through the wilderness inventory process in 1979), and/or whose continued use was determined to impair the wilderness character of the area. Unauthorized roads and trails created or discovered since that time would be closed and rehabilitated, in compliance with the Wilderness IMP. BLM believes that the use of existing routes or "existing ways" within designated WSAs (that is, those routes present prior to the passage of FLPMA in October 1976), as specified under the preferred alternative, represent an optimal balance of motorized and non-motorized use. We believe that the preferred alternative provides best balance of public access and environmental protection with respect to managing wilderness characteristics.

Comment Number: #32-1

Comment: It's a mistake to designate routes within the WSAs and map them. Formal designation of routes could mean wilderness quality of the WSA could be impaired and no longer suitable for the wilderness designation, and would be a violation of FLPMA.

Response: BLM is required by federal law (Executive Order 116444 as amended) to designate all areas and trails for off road vehicle use or restrictions. Where limits on motorized OHV use are needed to protect public lands, BLM can take action under the existing land-use planning process to limit or restrict motorized OHV use. These decisions can be: site specific, limiting use to specific ways; seasonal, limiting use to a certain time of the year; or other, by type of vehicle, number of participants or particulars, etc. To protect areas where resources are at risk, BLM can designate areas or roads, trails, or ways as closed to motorized OHV use.

18.4 General

Comment Numbers: #5-1, #5-7

Comment: Nut Mountain Allotment 01010 and Sand Creek Allotments: Request that all roads with current access to Nut Mountain and Sand Creek allotments remain open and unrestricted.

Response: Management actions in the RMP will not impact private property access (ingress and egress).

Comment Number: #7-5

Comment: Need to clearly distinguish motorized and non-motorized use areas (blurring of "semi-primitive motorized" with "semi-primitive non-motorized" designations as "back country") and ensure the latter will be enforced

Response: "Semi-primitive motorized", "semi-primitive non-motorized", and "backcountry" are recreation opportunity spectrum (ROS) terms which generally describe the type of recreational experience that BLM planners would manage for in a particular area. It is the Off-highway Vehicle (OHV) Use Designations that clearly distinguish allowable uses as to motorized or non-motorized areas. OHV designations are defined as follows (see Glossary):

- Open – Designated areas and trails where OHVs may be operated subject to operating regulations and vehicle standards set forth in BLM Manuals 834l and 8343.
- Limited – Designated areas and trails where OHVs are subject to restrictions limiting the number or types of vehicles, date, and time of use; limited to existing or designated roads and trails.
- Closed – Areas and trails where OHV use is permanently or temporarily prohibited. Emergency use is allowed.

BLM rangers will monitor motorized uses within the ELFO to the maximum extent possible to ensure that use is restricted to designated areas.

Comment: Commenter (Estill) opposes preferred alternative to establish various ROS zones within all 6 of his allotments to the extent that it intends and/or is interpreted and applied to limit/close any motorized access to facilitate the livestock operations upon the 6 allotments, particularly necessary at times to maintain range improvements and to manage the livestock.

Response: ROS classifications do not close routes or motorized access for authorized uses. Maintaining ongoing livestock operations by a permittee/landholder would be considered an authorized use.

Comment Number: #14-42

Comment: Existing MFPs are clear on OHV designations but no action alternative fails to describe existing situation.

Response: The current existing OHV designations are found within the first paragraph of the Draft RMP, Travel Management, Section 2.14.5.

Comment Number: #17-11

Comment: It is unclear whether PacifiCorp's use of OHVs to maintain power transmission and distribution lines is expressly authorized or otherwise officially approved. We must be allowed access to inspect or repair its structures and facilities without vehicle access restrictions. Definition of administrative tasks should be expanded to include power delivery operation and maintenance activities and include emergency actions necessary to re store power.

Response: Access for maintenance repairs and emergencies can be provided for in the Right-of-Way grant corridor.

Comment Number: #20-3

Comment: Ensure that the Guidelines in Appendix C are considered in monitoring efforts for project impacts. In particular, the FEIS should discuss monitoring to comply with Guideline 2 (ecological degradation from OHV use, including a monitoring timeline) and Guideline 14 (monitoring for utilization and impacts).

Response: Section 2.14.4 Travel Management references the Northeast California Resource Advisory Council Recommended Off-Highway-Vehicle Management Guidelines (listed in Appendix C) that will be used to monitor OHV use and degradation of natural or cultural resources.

Comment Number: #23-17

Comment: Agency supports designation of "limited" to previously "open" areas.

Response: Thank you for your support of this management approach.

Comment Number: #26-32

Comment: Do not close travel ways for use for management.

Response: Travel ways would remain accessible for use by BLM management. A system of designated roads, ways, and trails would provide reasonable opportunities for not only recreation access to distant locations but administrative use as well. All routes identified in the 2004 inventory (1,944 miles) would be designated. In addition, exemptions for administrative access, emergencies, livestock operations, and mineral authorizations would be allowed.

Comment Number: #26-39

Comment: Traditional uses and back roads should not be denied to traditional users such as ranch operators, miners, and other self reliant users. Travel management should consider relative risk and safety levels for the general public that may be unfamiliar with the high desert.

Response: A system of designated roads, ways, and trails would provide reasonable opportunities for motorized recreation and motorized access to distant locations; including trailheads for non-motorized, cross-country travel (for activities such as hiking, hunting, fishing, and horseback riding). All routes identified in the 2003 inventory (1,944 miles) would be designated. Exemptions for administrative access, emergencies, livestock operations (ranch operators), and mineral authorizations would be allowed.

Comment Number: #29-5

Comment: Page 2-79. Vehicle travel management provisions for off-road vehicle use is requested to be amended in all three RMPs to be consistent with the Alturas RMP (page 2-105) to allow for motorized retrieval of harvested big game when authorized by state permitted tag as well as other permitted activities.

Response: All three offices have considered the big game retrieval issue very carefully. Their decisions are as follows: Eagle Lake has decided not to change the preferred alternative to allow an exemption for using motorized retrieval of harvested big game off of designated use. Their rationale can be found in the response to this same comment in that PRMP / FEIS. The Alturas Field Office has not changed its proposal to allow retrieval of harvested big game when authorized by state permitted tag or other authorized activity. Under the proposed action in this PRMP / FEIS, the Surprise Field Office has decided to allow off-road retrieval of big game during hunting season except in WSAs. We share the concerns of our other offices regarding the potential for route proliferation as a result of allowing this exemption and have expanded the discussion in Chapter 2.14.4 to identify / clarify additional vehicle restrictions for hunting off road, and to reinforce an important point that BLM law enforcement is expected to be heavily involved for compliance with this exemption to OHV travel.

Comment Number: #34-6

Comment: Travel management section text should be clearer on what practical differences are between the designation of off-highway vehicle routes as “existing” and “designated” (2.14, page 2-70)

Response: The discussion in Section 2.14 has been expanded to clarify these terms. In addition these terms are found in the Glossary under the definition of ‘Limited’ for Off-Highway Vehicle. For management purposes, “existing ways” are defined as the on-the-ground routes identified in BLM’s 1979 roadless area inventory. The recent GPS inventory (2003) is more accurate and up-to-date. It provides baseline information for management planning in this RMP. Routes that have appeared since the 1979 inventory are in violation of the Wilderness IMP. Therefore, during the RMP process, some ‘existing’ ways will be designated and some will not. Routes in violation will be closed and rehabilitated. As a result, limiting vehicles to ‘designated routes’ will provide at least as much, if not more, protection for WSAs than limiting OHVs to ‘existing routes.’

Comment Number: #35-19

Comment: Recommend including additional detail to Section 2.14; each alternative should include acreage breakdown like in Executive Summary so reviewer can compare acres that are open, limited to existing roads and trails, and closed for OHV use (2-70-2-73).

Response: Table 2.14-1 of the PRMP / FEIS provides a breakout of the OHV designations for the preferred alternative. Discussions of the other alternatives are not reprinted since they have not changed from the Draft RMP EIS. However, The Alternatives Summary at the end of Chapter 2 provides such a summary comparison across all alternatives; see the section on Travel Management.

19.0 VEGETATION

This section is divided into the following subsections:

19.1 – Special Status Plants
19.2 – Riparian-Wetlands Associations
19.3 – Noxious Weeds
19.4 – Seeding / Grass Banks
19.5 – Fire Use and Prescribed Fire
19.6 – Juniper
19.7 – Sagebrush
19.8 – Livestock Grazing / Rest
19.9 – General Vegetation Comments

19.1 Special Status Plants

Comment Number: #7-8

Comment: Fully protect all rare, federally listed, and state-listed T&E species.

Response: This is one of BLM's responsibilities by law and is included as a goal and objective of the PRMP / FEIS. It is also consistent with the proposed management actions under our preferred alternative.

Comment Number: #21-16

Comment: All proposed ground or habitat disturbing activities should be preceded by a rare plant survey using accepted methodologies and properly trained botanists.

Response: We agree and this is consistent with the proposed management plan. Such activities would require the proper environmental clearances before they could proceed; all such plant surveys would be conducted by qualified staff following appropriate and accepted methodologies. Thank you for your concerns.

Comment Number: #23-22

Comment: The referenced BMPs for special status plants need to be included in the text or Appendix.

Response: Generally, the term Best Management Practice is not used for special status plant (SSP) mitigation. The preparation of a Biological Evaluation (BE) is the process used to determine if a proposed action will result in a loss of reproductive viability of a SSP or not. Mitigation measures (management actions) described in a BE are incorporated into EAs where SSP are present.

Comment Number: #27-1

Comment: Draft EIS and RMP are lacking in sufficient detail regarding status of the seven special status plants found in the Surprise office planning area and fails to list even what the species are. Table 3.15-2 is stated to contain a list, but it is actually a list of noxious weeds. At a minimum, DEIS should include a list of all SSPs and for each species, including a description of habitat requirements and ecology, current population trend and status throughout range of species and within SFO, and other items as specified in the comment.

Response: The commenter is correct. Table 3.15-2 in the Draft RMP is a table of known noxious weeds. Table 3.19-1 has been added to the PRMP / FEIS that identifies the special plant species, and the noxious weed table has been renumbered accordingly.

Comment Number: #27-2

Comment: The document does not address impacts to the seven special status plants from the proposed management activities; refers to Section 3.15 (Affected Environment) as lacking sufficient discussion of impact. Concerned about potential impacts to special status rare native pants (and all native plant communities) from livestock grazing, seeding of non-native grasses, juniper eradication schemes, invasive non-native weeds, OHV traffic, and mining activities. Habitat needs for species must be assessed in quantitative and qualitative terms; impacts to the habitat from past, current or reasonably foreseeable future actions also must be evaluated.

Response: The Proposed RMP has been revised to include Section 4.18 Potential Effects on Special Status Plants.

Comment Number: #27-3, #27-4

Comment: DEIS acknowledges that no monitoring has taken place recently to determine status of these species, and no monitoring requirements are included in the plan. DEIS also acknowledges that there may be suitable habitat for an additional 12 rare plants, but without monitoring, surveying, etc., it is not possible to determine their presence in the area or what impacts might occur. Failure to conduct monitoring and to include inventory and monitoring requirements does not meet the intent of NEPA which requires collection of high quality scientific information to support a good decision. Mitigation measures must be further supported by analytical data; DEIS fails to identify specific mitigation measures for impacts to SSPs. Need accurate data to evaluate impacts.

Response: The commenter (California Native Plant Society) is correct in stating that no on-going monitoring is occurring for special status plant species (SSP). Monitoring, primarily in the form of plant surveys or inventory, occurs almost exclusively for proposed projects. These projects include ground disturbing activities such as fences, livestock reservoirs, and seedings. Actions that may affect SSP are more appropriately addressed in site-specific EAs. Site-specific mitigation measures are addressed in project-specific EAs and would be a level of detail not appropriate for the programmatic natures of this RMP EIS. Surveys will be conducted on all proposed projects for the presence of BLM special status species. No Biological Evaluations (BEs) exists for SSP in the SFO. Mitigation measures incorporated in site specific EAs have addressed SSP and occurrences have been avoided; it was elected not to write BEs because of this. The SFO will decide, in consultation with other BLM botanists, if BEs will be written for future proposed projects, especially for prescribed fires, hazardous fuels reduction projects, and for sagebrush steppe restoration projects. There are no known candidate species that occur in California on public lands administered by the SFO. There is one known candidate species that occur in Nevada on public lands administered by the SFO; it is Soldier Meadows cinquefoil (*Potentilla basaltica*). Former candidate species do occur in Nevada; these are now "watch" species as designated by the Nevada Natural Heritage Program (NNHP).

Comment Number: #34-14

Comment: Recommend an individual section on impacts summary table for special status plants (Page 2-166).

Response: We agree that special status plants deserve an individual breakout in the Impacts Summary Table (at the end of Chapter 2) and have added such a section to the PRMP / FEIS.

Comment Number: #35-36

Comment: Species list provided by USFWS included the slender moonwort but no discussion of this species in the RMP/EIS. Given its potential to occur in SFO and BLM proposed some management actions in areas of potential occurrence, BLM should include a discussion of this species and assess impacts of proposed management actions on it.

Response: There are no known locations of *Botrychium lineare*, slender moonwort, in the SFO. Habitat and current locations occur in Fresno County, California. Some habitat found at the higher elevations of the SFO is similar to that found in Fresno County, but none exists in the SFO. It is acknowledged that extensive surveys for this species have not been conducted; however, any future surveys conducted will include slender moonwort. This candidate species is also a NNHP watch species. Future surveys conducted to fulfill NEPA requirements will include slender moonwort. Mitigation measures will be addressed in site-specific EAs.

19.2 Riparian-Wetlands Associations

Comment Number: #7-6

Comment: Prioritize protection of streams and riparian areas to protect biodiversity (chemical use, livestock, allotments, roads).

Response: SFO has a list of priority perennial and intermittent streams and priority is also set based on riparian functional assessment rating of the riparian system and the associated resource values (see Section 2.15). These sites are the highest management priority because, without management, these riparian resources are expected to decline. Where riparian areas or water quality is not meeting Standards for Rangeland Health or the riparian areas is not in properly functioning condition or functional-at-risk with an upward trend, BMPs such as livestock/wild horse riparian exclosures, reducing the amount hot season-of-use by livestock, closing or relocation of roads, buffer zones would be implemented on a case-by-case basis depending on the situation.

SFO has not applied herbicides directly to surface water, although there are herbicides that are registered by EPA and approved by BLM that could be applied to surface water. The aquatic herbicides (such as Rodeo) were addressed in the California Vegetation Management Final Environmental Impact Statement (FEIS), (August 1998), Final Environmental Impact Statement Vegetation Treatment on BLM Lands in Thirteen Western States, USDI-BLM, (May 1991) and our local SFO EA #CA370-04-05. In the future, the approved aquatic herbicides could be used to treat aquatic noxious weeds to enhance wildlife habitat, improve riparian values, and reduce/prevent soil erosion if and when the need arises.

Comment Number: #35-34

Comment: Given high percentage of riparian wetland that was assessed as Functional at Risk, it would be useful to know how BLM proposed management actions will improve conditions of these areas.

Response: Section 2.15.5 of the Proposed RMP has been revised to include the following management actions: “Prescribed fire, manual, and mechanical treatments will be used to restore 50 to 100 acres per year of riparian areas. Treatments will be prioritized to achieve healthy and productive wetland and riparian habitats, and achieve habitat diversity and hydrologic stability. Livestock salting will not be permitted within one quarter-mile of springs, meadows, streams, aspen stands, and archaeological sites. Suitable locations would be determined by BLM in consultation with livestock permittees.”

19.3 Noxious Weeds

Comment Number: #7-25

Comment: Reduce herbicide/toxic chemical use to zero over time, avoid specific herbicides, avoid aerial and boom application near water. In general, prioritize prevention of invasive plants. Don’t use toxic pesticides, lethal gas, napalm equivalents, strychnine bait. Stop using federal animal damage control (APHIS). Make sure any biocontrols have been fully tested against representative native plants.

Response: BLM is committed to implementing an integrated weed management approach that includes chemical use, as well as prevention, along with mechanical, manual, and biological controls. All control actions, including herbicide application, would be conducted under the guidelines specified in the legislative, regulatory, and policy direction documents listed in Section 2.16.4. At this time, we have no scheduled reduction of herbicides. The SFO evaluates all weed infestations each year to determine if integrated pest management elements are providing expected results. All projects integrate the SFO Prevention Schedule (Appendix F). This document provides information that addresses the prevention program.

Of the chemicals addressed by your letter: Herbicides that are included in the CA Vegetation Management EIS (August 1988) and the Integrated Weed Management Program EA (Number CA350-04-01, BLM Alturas, Eagle Lake and Surprise Field Offices) include 2, 4-D, dicamba, chlorsulfuron, sulfometuron methyl, and triclopyr. Herbicides that are registered in CA but not included in the SFO EA at this time are imazapyr and diuron. Herbicides that are not registered in CA are picloram and metsulfuron methyl. There would be no reason to use any of the following chemicals, nor are they addressed in any of our environmental documents: lethal gas, napalm equivalents or strychnine bate.

Three Federal statutes, the Plant Quarantine Act of 1912, the Federal Plant Pest Act of 1957, and the Federal Noxious Weed Act of 1994, provide authority for the Animal and Plant Health Inspection Service (APHIS) to regulate the movement of live plant pests into and through the United States. The U.S. Department of Agriculture and the California Department of Food and Agriculture are also required to comply with the regulations of other federal agencies. APHIS carefully weighs risk against expected benefits before making decisions to issue permits. All permits for biocontrol agents are held by our cooperator the California Department of Food and Agriculture, Plant Health and Pest Prevention Services, Integrated Pest Control Branch, Biological Control Branch, Biological Control Program.

Comment Number: #23-21

Comment: Control of cheat grass may require the use of OUST or PLATEAU as herbicides.

Response: The use of Oust and Plateau to control cheatgrass is currently restricted with respect to volume and location. Oust (sulfometuron methyl) is approved for use by BLM in Nevada but not in California. Areas where registered use is appropriate are for forestry use and non-agriculture uses on noncrop sites, but not for rangelands. A Special Local Need 24 (C) label was issued to the State of Nevada on 07/30/1999 for use on fire-damaged lands and fuel breaks but has since been voluntarily canceled by manufacturer (BASF) on 11/03/2005.

Plateau (imazapic) is currently for experimental use only**,** and limited to no more than 15 total acres until the appropriate NEPA documentation is completed and approved (BLM's Vegetation Treatments Programmatic EIS and ROD). Currently, the size of each plot must not exceed 5 acres, with a limit of no more than 3 plots per field office/station. Plateau must be used only in cooperation with a university or Agency weed scientist or chemical technical representative on an experimental basis only. At present, it is only registered for weed control, native grass establishment, and turf growth suppression on pastures, rangeland, and non-cropland areas. The SFO currently has one experimental medusahead Plateau treatment site established in the Snake Lake area in cooperation with Dr. Joseph M. DiTomaso, University California Davis and Rob Wilson, University of California Cooperative Extension Farm Advisor, Lassen County.

Comment Number: #34-8

Comment: Recommend that the preferred alternative include "emphasize restoration of infested noxious weed sites to native vegetation" (2.17.10, page 2-87).

Response: A statement that "Treatments will focus on restoration of sites to native plant communities" has been added to Section 2.16.5 of the PRMP / FEIS.

19.4 Seeding / Grass Banks

Comment Number: #7-9, #27-13

Comment: Give preference to native species over non-native species. EIS and RMP must halt the seeding of public lands with non-native grass seed.

Response: As described in Section 2.15.5, seeding for emergency stabilization and rehabilitation following wildfires, rangeland improvement projects, and efforts to enhance livestock forage would be conducted with a suitable mixture of seed from locally evolved native forbs and grasses and desirable non-local and introduced species. The precise mixture would be determined on a site-specific basis in accordance with existing BLM policy (California Native Seed Policy). It would consider the probability of success, risks associated with failure, and other considerations. In general, locally gathered, native seed or plants will usually be used for seeding and planting areas burned by wild or prescribed fire, juniper treatment areas, and other disturbed areas. However, non-local native seed may be used when local seed is unavailable. For some uses, under certain circumstances, non-native seed or plants may also be employed. The use of non-native seed would be determined on a case-by-case and site-specific basis in accordance with existing BLM policy (see Section 2.15.4).

Comment Numbers: #8-4, #24-7

Comment: Consider formation of a regional seed bank rather than local to make sure sufficient native seed supplies are available to reseed burned areas.

Response: We agree that regional native seed banks would be very useful for re-seeding efforts and would create a locally gathered native seed cache to facilitate seeding projects. We will also continue efforts to identify other existing banks in the region; we are currently aware of regional seed banks in Boise, ID and Bend, OR. In general, locally gathered, native seed or plants will usually be used for seeding and planting areas burned by wild or prescribed fire, juniper treatment areas, and other disturbed areas. However, non-local native seed may be used when local seed is unavailable. For some uses, under certain circumstances, non-native seed or plants may also be employed.

Comment Number: #8-5, #24-8

Comment: Develop pre-fire agreements to use certain non-native seed if sufficient native seed not available. Encourage development of pre-fire agreements that allow for use of certain non-native seed (if native seed supply insufficient) rather than leave bare ground.

Response: As described in Section 2.15.5, locally gathered, native seed (or non-local native seed when local seed is unavailable) will be used for post-fire stabilization and rehabilitation, wildlife habitat restoration, forage augmentation efforts and other such projects. However, BLM acknowledges that in some instances where re-seeding with native seed is not possible, the use of non-native seed may be necessary, such as to re-establish vegetation and facilitate erosion control. The use of non-native seed would be determined on a case-by-case and site-specific basis in accordance with existing BLM policy.

19.5 Fire Use and Prescribed Fire

Comment Number: #14-30

Comment: Brief review and comparison of the fire management, fuels, vegetation, wildlife and cultural resources alternatives indicates that the RMP lacks the coordination required in items 3 and 7 listed in Appendix C of the Planning Handbook H-1601-1: (3) Identify allowable uses and management actions to achieve goals and objectives, and support the goals and objectives for vegetation, wildlife and other resources. (7) Identification of restrictions on fire management practices needed to protect resources.

Response: The discussion in section 2.4.5 has been revised to address the need to protect sensitive resources and wildlife habitat from fire and fuels management actions. We believe that the identified allowable uses and proposed management actions listed within Chapter 2 for cultural resources, fire, fuels, vegetation, and wildlife are adequate to meet desired future conditions, goals, and objectives, as listed in the PRMP.

Comment Number: #21-1

Comment: CDFG is concerned with the use of fire to manage sage grouse habitats as fire is very hard on sagebrush and can take 25 or 100 years to recover.

Response: Alternatives make use of all available tools for habitat management. Fire is one tool that could be used and is a normal part of the ecosystem; however, the choice to use fire would be done on a site-specific basis as referenced in the Vegetation, Wildlife, and Fuels sections. Factors such as sage-brush type, size of fire, season of burn, fire history, presence of noxious and invasive weeds, and effects to species would be considered during site-specific analysis for any such project.

Comment Number: #25-37

Comment: Extreme care should be exercised when planning use of prescribed fire or other vegetation treatments in sagebrush communities in planning area. The EIS should disclose areas where the future use of prescribed fire is proposed, how noxious weeds, livestock grazing, soils, vegetation, wildlife, and other resources will be affected by such management. One study recommends that sagebrush within 1.9 miles of a lek not be burned in order to protect nesting habitat. Fire on the nesting grounds is not recommended in any season if nesting habitat is limited.

Response: In general, we agree with this comment and exercise extreme care in planning use of prescribed fire or other vegetation treatments in sagebrush communities. Our management strategy is consistent with the protection of lek nesting habitat, as identified in various local, state, and national guidelines for managing sage-grouse and their habitats (Conservation Strategy for Sage-Grouse (Centrocercus urophasianus) and Sagebrush Ecosystems within the Buffalo-Skedaddle Population Management Unit (Northern California Sage-Grouse Working Group, 2006); Greater Sage-Grouse Conservation Plan for Nevada and Eastern California, First Edition (2004), including the Vya and Massacre Conservation Strategies. Implementation of these conservation strategies, as described in Section 2.22.5, is a major component of our management approach for the protection of sage-grouse and sagebrush ecosystems under the proposed action. Potential impacts from prescribed fire and other vegetation treatments on environmental resources in the planning area are addressed in Chapter 4 of the PRMP / FEIS. In addition, a separate environmental review would be conducted prior to the use of any prescribed fire to evaluate and minimize site-specific impacts on sagebrush communities in the SFO planning area.

Comment Number: #30-15

Comment: Fire (natural and prescribed) should be reintroduced only after livestock have been removed from area for sufficient period of time to allow for recovery of native vegetation and regeneration of soils.

Response: Most of the areas proposed for treatment with prescribed fire are within the sagebrush steppe ecosystem encroached by western juniper. Where additional fine fuels are needed to carry a prescribed fire, additional rest from livestock grazing would be implemented before use of fire management.

Comment Number: #30-16

Comment: Fire – both natural and prescribed – should be used to control western juniper once landscape is demonstrated to be capable of handling the disturbance. Where inadequate ground cover exists to carry fire sufficient to ignite the larger trees, those trees should be individually ignited. Prescribed fires should be small to avoid negative effects to greater sage-grouse.

Response: Under the proposed action, fire management would have a range of appropriate tools available for use in control of western juniper encorachment sagebrush ecosystems. An appropriate management response would be determined for every wildland fire. Specific treatments for each planned area to be burned are designed carefully, considering an array of site specific factors, including the ability of the fire to carry between vegetation types.

Comment Number: #30-17

Comment: Use of mechanical methods to treat western juniper are less effective over large tracts and fail to provide many ecological benefits of fire. Fire is preferable method.

Response: We acknowledge the important role of fire in juniper management, and are using this method currently in areas we believe are most appropriate. Our final selection of treatment methodology will depend upon a number of site-specific factors, including the vegetation type, and associated risks to sensitive resources or high-risk communities.

Comment Number: #21-7, #30-21

Comment: Aspen can be enhanced by judicious use of mechanical treatment (e.g., removal of encroaching juniper) and prescribed fire (if not too hot). Burning is preferable to mechanical treatments to restore quaking aspen.

Response: BLM would continue to implement cutting and burning, as appropriate, in aspen stands with conifer encroachment – separately or in combination – to create early succession conditions. Both methods along with other methods proposed, as described in Section 2.15.5, are beneficial because they promote "suckering" and create diverse, multi-aged stands. In addition, BLM would implement plantings (root/seed/sapling), alternative grazing régimes, forage utilization limits, and exclosure fencing to restore aspen where these species have declined.

19.6 Juniper

Comment Number: #7-14, #30-20

Comment: Juniper reduction should leave old growth juniper stands and also leave patches for wildlife use. Old growth western juniper must be protected. Old growth western juniper must be protected. Support designation of ACECs to protect old growth juniper.

Response: We intend to protect old growth stands and would design vegetation treatments to maintain and ehance old-growth stands based on local habitats. Under the proposed action, we would manage for protection of old growth juniper stands. Native or true juniper woodlands are characteristic of several soil types found in the SFO planing area. Western juniper would be preserved on these sites and managed for major stages of woodland development.

In addition, small amounts of juniper would be retained in sagebrush-steppe areas where juniper has encorached to preserve biodiversity and wildlife habitat. Section 2.6.5 has been revised to state: "All fuels management projects would be designed in accordance with wildlife habitat objectives. Caution would be taken to not introduce fire into already degraded communities dominated by annual grasses. Fuels projects would not be undertaken in low sagebrush communities, particularly in known sage-grouse or pygmy rabbit habitats, unless needed to meet specific habitat objectives. Fuels projects would be coordinated with state game agencies regarding important wildlife habitats." Regarding designation of an old growth juniper ACEC, see response to comment #30-20 in ACECs subsection of this appendix.

Comment Number: #21-3

Comment: Small sized junipers are more efficient to attack by hand methods on an "invasion front". Hand follow-up should take place on all removal sites to eliminate crown or stump sprouting. Prescribed fire should be specifically avoided as a way to control juniper.

Response: We agree that manual removal of small juniper is the preferred method. It is our primary method; and we typically do not burn for the specific purpose of removing juniper in this case. Prescribed fire is one tool that could be used; however, it is applied in appropriate situations, such as when the following conditions are present: good understory, young juniper, and no risk of damage to the community. Regarding hand follow-up, BLM does follow up and treat old cuts by hand.

Comment Number: #21-4

Comment: Post juniper project removal sites need to be evaluated for the impact of livestock grazing on subsequent revegetation, since grazing intensity can determine if a site reverts to forb, weed, grass, or shrub dominated habitat.

Response: BLM does not allow overgrazing and monitors vegetation response for effects from treatment. Section 2.15.5 has been revised to state: "Proposed vegetation treatments will be evaluated with regard to rehabilitation requirements, especially concerning invasive plants and noxious weeds." Decisions to re-open grazing after treatment would be made on a case-by-case basis.

Comment Number: #23-42

Comment: Juniper old forest stands provide important habitat to wildlife. These historical or potential sites need to be delineated to better address fire strategies.

Response: We intend to manage for the protection of old growth juniper stands. Native or true juniper woodlands are characteristic of several soil types found in the SFO planing area. Western juniper would be preserved on these sites and managed for major stages of woodland development. All fuels management projects would be designed in accordance with wildlife habitat objectives.

Comment Number: #27-5

Comment: No evidence that the juniper eradication as planned will result in restoration of anything having to do with native and natural ecosystems and processes. DEIS and RMP fails to provide any scientific basis for juniper invasion outside of a range management context, nor does it provide any documentation of restoration benefits from its removal. Commenter takes exception with statement that the "historical coverage and conditions of juniper in the field office area are unknown" (page 3-38). EIS must correctly describe the history of juniper woodland distribution and baseline vegetation must be described by a professional ecologist. Role of juniper as important carbon sink during era of global warming should also be considered in cumulative impacts analysis. Comment letter appears to include some historical information on juniper as well. EIS must take "hard look" at historical conditions of the sagebrush steppe biome and reach back in time to determine benchmark juniper distribution. EIS must note and disclose that there is a difference of opinion among scientists as to the reason for juniper expansion (e.g., statement that present range expansion is largely due to fire suppression is hypothetical and not borne out by known facts). Climate fluctuation may play role. EIS must remove proposals to eliminate native western juniper.

Response: Section 3.6.2.2 of the Proposed RMP has been revised to delete the above referenced sentence. Section 3.17.1.4 provides a more accurate description of the historical range of juniper within the SFO. Proposed management actions within the Proposed RMP have no intention of eliminating native western juniper; rather, treatments are designed to restore sage-brush steppe or other communities that have been encroached with juniper.

Comment Number: #27-9

Comment: Importance of older, mature, or old-growth juniper to cavity nesting birds and as reliable sources of berries for neotropical migratory birds and other wildlife must be discussed

and protective measures must be included to avoid impact to natural stands of older juniper, which can still have small diameter trunks. Tree diameter limits must be included in the EIS.

Response: We intend to protect old growth stands and would design vegetation treatments to maintain and ehance old-growth stands based on local habitats. Under the proposed action, we would manage for protection of old growth juniper stands. Native or true juniper woodlands are characteristic of several soil types found in the SFO planing area. Western juniper would be preserved on these sites and managed for major stages of woodland development.

In addition, small amounts of juniper would be retained in sagebrush-steppe areas where juniper has encorached to preserve biodiversity and wildlife habitat. Section 2.6.5 has been revised to state: "All fuels management projects would be designed in accordance with wildlife habitat objectives. Caution would be taken to not introduce fire into already degraded communities dominated by annual grasses. Fuels projects would not be undertaken in low sagebrush communities, particularly in known sage-grouse or pygmy rabbit habitats, unless needed to meet specific habitat objectives. Fuels projects would be coordinated with state game agencies regarding important wildlife habitats." Regarding designation of an old growth juniper, see response to comment #30-20 in ACECs subsection of this appendix.

Regarding tree diameter, there are other factors to consider besides tree diameter, and these factors vary depending on specific needs of a given area. Therefore, BLM prefers to maintain flexibility in the RMP to consider all the relevant issues.

Comment Number: #27-10

Comment: DEIS includes proposals to promote "biomass" use for western juniper. This is a concern since no viable biomass industries currently exist in the region and proposal could promote an industry that will become reliant upon a natural resource about that is subject of significant scientific controversy.

Response: The SFO planning area is open and available for renewable energy development, including wind, solar, and biomass, as discussed in Section 2.3.6 of this Propose RMP / Final EIS. The main objective of western juniper treatments is to restore sagebrush ecosystems (and other plant communities) to a healthy condition. The harvested trees or biomass may be used for commercial purposes, depending on the site-specific plan and environmental analysis of the site to be treated. BLM has been working in cooperation with other agencies on the *Draft Sagebrush Steppe and Associated Ecosystem Restoration through Improved Resource and Western Juniper Management in Northeast California and Northwest Nevada (in progress,)*, which examines the potential for biomass industry in northeastern California.

Comment Number: #27-11

Comment: Shade provided by juniper is factor in halting spread of invasive annual weeds and in helping to create cooler microclimates. Researches have shown there is no scientific basis for assertions that juniper reduces water availability in arid environments, or increases erosion. This controversy must be fully analyzed in the EIS.

Response: The current scientific weight of evidence regarding juniper in the SFO-managed ecosystems support the goals, objectives, and proposed management actions in the Preferred Alternative. Should the scientific consensus on this topic change, BLM's management approach would be adjusted accordingly.

Comment Number: #29-17, #29-18, #30-14

Comment: Commenter supports simple straight-forward policy that clearly demonstrates an active and aggressive approach to controlling juniper invasion and does not include unnecessary limits on juniper removal needs to be articulated. New juniper invasions where trees are still small and shrub and herbaceous plant community is still intact should be high priority for treatment. Solution to western juniper encroachment is reintroduction of fire and elimination of livestock grazing on sagebrush steppe.

Response: We believe that our proposed management actions/restoration treatments for sagebrush-steppe communities thoughtfully and sufficiently address encroachment of these communities by western juniper as well as impacts from grazing, and that these treatments do not contain unnecessary limits. Juniper removal, where we believe it is required, would be conducted in an environmentally sensitive manner. Chapter 2.15 identifies a variety of treatment options and the conditions under which each method would be considered and selected. It also identifies the areas and a range of acreages that would be targeted under the preferred alternative. SFO does not have new juniper invasions where trees are still small and shrub and herbaceous plant community is still intact. All restoration treatments would include measures to minimize the introduction or spread of noxious or invasive species.

Comment Number: #30-12

Comment: Sagebrush Sea Campaign has produced a position paper presenting an ecologically based program for removing expansion western juniper from sagebrush steppe; enclosed copy and offers comparison between it and RMP (also considering Braun's "Blueprint"). First one is that historic and current livestock grazing contribute to conditions that favor juniper encroachment.

Response: Thank you for your comment. BLM realizes that there is much research regarding contributing factors to the encroachment of western juniper into sagebrush ecosystems. We appreciate the opportunity to review and consider additional guidelines in the development of management actions for sagebrush ecosystems and sage-grouse populations in the SFO planning area; we agree it is part of the updated standards and guidelines science. BLM staff make every effort to stay current with the various management strategies and prescriptions being implemented today, especially the more successful ones. We will consider adopting in the future some of the actions identified in the Blueprint that are appropriate for the SFO planning area. However, because we already have a Conservation Strategy for Sage-Grouse that is specific to our planning area, and therefore directly applicable to the existing sage-grouse population and sagebrush ecosystem conditions and concerns facing us, we are adopting guidelines from BLM's own Conservation Strategy for Sage-Grouse as our management protection measures under the proposed action (see Section 2.22.5 of the Proposed RMP Final EIS). We will continue to consider additional guidance, as appropriate and available, as we implement measures to bring us closer to full restoration, protection, and enhancement of this important species and its habitat.

Comment Number: #30-13

Comment: Before western juniper treatments occur on public lands, need to determine if goal is ecosystem restoration or production of forage for domestic livestock – only the former is ecologically sustainable.

Response: Ecosystem restoration is our main goal, as stated in Chapter 2. BLM's vegetation goal, as described in Section 2.15, is to restore, protect, and enhance the health and diversity of native (and desirable non-native) plants, plant communities and associations throughout the management area. Under 43 CFR 4180, BLM is required to apply our standards for land health and to ensure that vegetation meets, or makes significant progress toward meeting, the standards for land health – including biotic integrity and associated standards – while simultaneously supporting "appropriate uses" of the land. Appropriate uses, as determined under NEPA, would include those that do not adversely affect conservation of terrestrial vegetation or would not compromise healthy lands, restoration of lands that are healthy but lacking key attributes, or protection of at-risk or restoration of unhealthy lands. While grazing by livestock and wild horses would continue under the preferred alternative, they would be controlled through a variety of site-specific measures to improve land health; see proposed management actions in Section 2.15.

Comment Number: #30-18

Comment: Any western juniper treatment and subsequent management must consider potential to exacerbate and take measures to minimize spread of invasive, non-native species. In some cases, treatment of individual juniper trees is preferable to large ground fire to prevent weed invasion onto treatment site (e.g., cheatgrass).

Response: We agree with the commenter and believe that our proposed management actions with respect to western juniper treatment take such factors into consideration. Section 2.15.5 has been revised to state: "Proposed treatments will be evaluated with regard to rehabilitation requirements—especially concerning invasive plants and noxious weeds."

Comment Number: #30-19

Comment: Commercial use of western juniper should not be allowed without assurance it will not exceed supply of encroachment juniper that is targeted for removal from landscape.

Response: BLM will manage native juniper woodlands in a manner designed to maintain them in a healthy condition (see Chapter 2.15 Vegetation). Treatments to remove western juniper that has encroached into sagebrush steppe ecosystems will occur, also as outlined in Chapter 2.15. The main objective of these treatments is to restore sagebrush ecosystems to a healthy condition. The harvested trees or biomass may be used for commercial purposes, depending on the site-specific plan and environmental analysis of the site to be treated.

19.7 Sagebrush

Comment Number: #25-31

Comment: DEIS claims livestock grazing is major influence on sagebrush and riparian habitat and discusses how livestock grazing impacts to wildlife will be minimized. However, it does not discuss expected impacts to sagebrush communities or the species that rely on them from these management activities, nor does it provide scale on which they will occur. To what type of vegetation does this statement refer? Exactly how will sagebrush communities be manipulated and to what extent? What are the expected impacts from treatment of these communities?

Response: Impacts from livestock grazing on sagebrush and riparian communities, as well as those associated with wildlife habitats, are discussed in the revised Chapters 4.16 Vegetation, and Chapter 4.22 Wildlife and Fisheries.

Comment Number: #25-32

Comment: BLM has failed to disclose manipulation of activities and impacts that will occur to sagebrush communities. DEIS fails to disclose any of the threats that domestic livestock pose to these threatened communities. Big sagebrush canopy cover values on undisturbed relicts and kipukas does not support assertion by BLM that big sagebrush canopy cover increases due to livestock grazing. Studies indicate opposite. BLM should analyze impacts of long-term active management and its impacts on sagebrush communities to recover naturally.

Response: Impacts from livestock grazing on sagebrush and riparian communities, as well as those associated with wildlife habitats, are discussed in the revised Chapters 4.16 Vegetation, and Chapter 4.22 Wildlife and Fisheries. BLM is not aware that any kipukas exist within the SFO management area.

Comment Number: #27-7

Comment: Current loss of biodiversity and threats to sagebrush obligate species like the sage grouse are the result of catastrophic disturbances from human impacts to the sagebrush steppe biome and are not the result of juniper expansion. EIS must accurately document and discuss the impacts of catastrophic historical and on-going activities which took place over last 150 years that have resulted in declining populations in sage grouse.

Response: Populations of greater sage-grouse within the SFO have not necessarily declined in recent years. Although weather has sometimes drastically affected annual sage-grouse survey efforts, as recently as 2006, field work showed that the Surprise Field Office has approximately 50 active leks. Because most areas of the field office are only now being regularly surveyed, it is difficult to ascertain any loss or gains in historic lek numbers with great certainty. Recent surveys, however, indicate that the number of leks appears to be stable, although bird attendance varies annually. Survey efforts between the mid 1990s and the present in the Surprise Field Office area have found active historical leks and several previously unknown active leks. The population of sage-grouse (about 500) in the Warner Lake watershed is one of the largest in northeastern California.

19.8 Livestock Grazing / Rest

Comment Number: #11-15

Comment: Rejects provision that burned lands would be rested from livestock grazing for a minimum of 2 growing seasons; should rely on assessment process to determine suitable resting period.

Response: Our local information and data show that two growing seasons is the minimum resting period necessary for recovery of plants following fire, in order to meet land health conditions. In addition, plants must meet the ability to withstand grazing; this would be determined based on a site-specific assessment at the end of the two-year growing cycle.

Comment Number: #25-15

Comment: Commenter cites other studies regarding effects of different livestock grazing intensities on forage plant production, use of quantitative ecology in range management, etc., to make point that grazing during different seasons was less important than grazing intensity. Additional studies referenced on long-term stocking rate appear to show that under actual field conditions, light grazing (25% or less by livestock) is most appropriate to meet BLM's mandate for sustainable use. BLM should require at least minimum compliance with these standards in RMP until standards can be evaluated at site-specific level.

Response: We appreciate your comment and bringing these other studies to our attention. However, BLM will be implementing the Standards and Guidelines as directed by our grazing regulations (43 CFR 4180.2(c)). In accordance with these Standards and Guidelines, we would adjust livestock levels, as needed and appropriate, on a site-specific basis. As stated in the revised Section 2.8, review of existing permitted use-levels (AUMs) would be conducted on individual allotments through assessment of existing activity plans (allotment management plans or their functional equivalents, livestock grazing decisions, habitat management plans, watershed management plans, biological opinions, multiple-use decisions). Decisions regarding adjustments to existing levels of use, forage allocation, allotment boundaries, and changes to management level categories would be made at the activity plan level.

Comment Number: #25-16

Comment: BLM must show that benefits of domestic livestock grazing out-weigh the costs to comply with Multiple Use Sustained Yield Act (MUSYA). DEIS fails to disclose any of the direct, indirect, or cumulative impacts associated with domestic livestock grazing from proposed management direction under any of analyzed alternatives. DEIS analysis of impacts is less than 1/2 page on page 4-77.

Response: MUSYA does not apply to BLM; therefore, BLM is not required to include such a discussion in the RMP. Chapter 4 has been revised to include an improved discussion of direct, indirect, and cumulative impacts associated with domestic livestock grazing. In both the Draft EIS and this Final EIS, please note that impacts <u>from</u> livestock grazing are addressed in Chapter 4 under each of the various resource areas that could be impacted by grazing (for example, vegetation or wildlife). The section referenced by the commenter presents the evaluation of impacts <u>on</u> livestock grazing from the proposed management actions. See Chapter 4 of PRMP / FEIS.

Comment Number: #25-28

Comment: Stating that stricter standards will improve range in declining conditions is a failure to disclose impacts and ignores real problem (may need to remove the cause). Restoration of degraded riparian areas is often ignored goal in land use plans and should have been considered in RMP. GAO study showed that restoring riparian areas was best accomplished by removal of livestock. Rest (in rest-rotation strategies) may not compensate for the increased use during grazing until sufficient recovery is achieved.

Response: Restoration of degraded riparian areas is an important objective of this RMP, as stated in Chapter 2.15. SFO has a list of priority perennial and intermittent streams and priority is also set based on riparian functional assessment rating of the riparian system and the associated resource values (see Section 2.15) Riparian assessments within the SFO are done on a site-specific basis, which allows BLM to carefully examine the causes of any degraded areas, and also work towards restoring those areas. The SFO has several local examples of improved riparian areas using changes to grazing season of use, or other improved grazing strategies. To address impacts from grazing, emphasis will be on adjusting existing grazing strategies where livestock grazing is limiting progress toward land health goals, PFC, and DFC – that is, "at risk" or Category 1 sites. Once the ecological potential of the riparian community is determined, site-specific riparian management objectives and management actions would be established. In the meantime, based on short-term monitoring, changes have been made to the Category 1 allotment terms and conditions to improve rangeland health. Rangeland improvement projects have also been made to minimize unacceptable livestock grazing impacts to riparian and spring areas and to improve livestock distribution.

Section 2.15.5 of the Proposed RMP has been revised to include the following management actions: "Prescribed fire, manual, and mechanical treatments will be used to restore 50 to 100 acres per year of riparian areas. Treatments will be prioritized to achieve healthy and productive wetland and riparian habitats, and achieve habitat diversity and hydrologic stability. Livestock salting will not be permitted within one quarter-mile of springs, meadows, streams, aspen stands, and archaeological sites. Suitable locations would be determined by BLM in consultation with livestock permittees."

Comment Number: #25-33

Comment: Removal of livestock from sagebrush communities in less than satisfactory condition should be a seriously considered alternative in RMP.

Response: We believe that the alternatives identified and evaluated in the Draft EIS provided a reasonable range of management alternatives from which to make our decision. Under the preferred alternative / proposed action, we would prioritize adjustments to grazing strategies for allotments or areas where plant communities are at risk or show moderate departure from land health standards.

Comment Number: #26-20

Comment: Observed (from looking at maps GRZ-1 and WHB-1) that those allotments that are moving toward but not yet meeting standards have horses on them. It would appear that damage done to the riparian of these allotments, which prevent them from meeting standards, could be possibly the result of wild horse use. Feel livestock industry has taken blame and financial loss due to the agencies and public's inability to properly manage wild horses. Raise a number of questions relating to lumping of use by livestock and wild horses, number of wild horses in relation to that prescribed, documented damage to riparian areas by wild horses, repaired fences torn up by wild horse, etc. BLM must manage its commitments in order to successfully meet riparian and utilization goals and standards.

Response: See individual responses below relating to specific questions raised in the comment:

Has livestock use and wild horse use been lumped together?

Wild horse grazing impacts are considered along with impacts from livestock in a multiple use context, however, during the allotment evaluation process, livestock and wild horse grazing use is normally divided on a percentage basis. Wild horse use is determined by using population estimates on a yearlong basis, unless seasonal distribution information is available. Livestock use is determined by actual use reports and field records by allotment, pasture, or use area basis. In a few instances, livestock or horse use can be separated if measured at variously times during the year. For example, in allotments with multiple pastures, utilization levels would be measured prior to livestock entering a pasture to determined utilization by wild horses; then livestock use would be measured when they are gathered from a pasture, and lastly utilization levels would be measured at the end of the year to determine additional wild horse use.

Has BLM documented damage done to riparian areas by wild horses?

We agree that partition of grazing use is important for determining cause and effect interactions. Monitoring information is analyzed and evaluated to determine what actions are necessary to make process toward meeting rangeland health standards, and are for establishing AMLs for wild horses.

Has BLM kept the horse numbers at levels prescribed?

BLM will continue to gather excess wild horses from HMAs to maintain the populations at the AMLs. As the commenter indicates, the timing of removal actions varies depending upon the availability of funding, labor, equipment, or contractors. Gathers are coordinated on a Bureau-wide basis, and within the past 15-20 years, most of the herds managed by the SFO have been over AML. Currently, 3 of 8 herds managed by the SFO are within AMLs; however, the BLM National Strategy Plan for wild horse management is to have all herds at AML by the end of 2007.

Has BLM maintained fences torn up by wild horses?

Generally, BLM has maintenance responsibility for exclosures in HMAs, and the permittees has maintenance responsibility for allotment and pasture fences. In most instances, BLM has maintained fences torn up by wild horses. However, we have found fence damage is caused by a variously reasons, and is not usually entirely contributed to wild horses.

Has BLM maintained their exclosures fences?

Exclosures are built for a variety of purposes. Recently, exclosures have been constructed to protect or enhance riparian values, particularly on those systems not meeting rangeland health standards. We believe improved riparian conditions ultimately benefit the livestock permittees. The SFO generally performs fence maintenance in HMAs, regardless of the circumstances that led to the degraded riparian conditions. Most of the higher priority riparian exclosures are inspected and maintained on annual basis, other exclosures are inspected less frequently.

Comment Number: #26-33

Comment: Vegetation management can occur using livestock as a tool; this option is often overlooked and should be considered more often.

Response: BLM manages livestock grazing on the majority of lands within the SFO, in accordance with land health standards and grazing guidelines. Properly managed livestock grazing is considered a beneficial impact to vegetation communities in many instances.

Comment Number: #29-15

Comment: Are grazing strategies such as deferment, rotation, season of use, etc. considered to be sources of "rest"? Some may interpret "rest" as no livestock grazing on site at all. Language needs to be consistent throughout document and clarified under what conditions shrubs would be rested from grazing.

Response: In general, management focus since 2000 has been on meeting land health standards through development of grazing systems that allow vegetation to receive periodic rest, shortened periods of use, use deferment, and varied seasonal use. A definition of "rest", as provided by the National Resources Conservation Service (NRCS), is provided in the Glossary, along with deferred grazing and rest-rotation grazing.

Comment Number: #25-27

Comment: The DEIS fails to disclose any impacts that have resulted from already existing range improvements and impacts that will result from constructing even more (cites examples of impacts to vegetation and soils).

Response: Impacts from existing range improvement projects, whether beneficial, or adverse, are reflected in the current land health assessment ratings within individual grazing allotments. Site-specific impacts from improvements are examined on an allotment basis, and are not included specifically in this RMP. Range improvements, in general, are prioritized for the distribution of livestock, such as to keep them out of certain areas. However, all improvements are monitored to ensure that they are improving resource conditions, as intended. Chapter 4 examines impacts from range improvements in general on vegetation, soils, and other resources. Chapter 4 states that livestock exclosures would have beneficial effects on riparian areas and temporary adverse effects on vegetation communities during construction, and that water developments would have minor and short-term effects during construction and cattle use. All range improvement projects must go through a site-specific environmental analysis prior to implementation.

Comment Number: #25-31

Comment: DEIS claims livestock grazing is major influence on sagebrush and riparian habitat and discusses how livestock grazing impacts to wildlife will be minimized. However, it does not discuss expected impacts to sagebrush communities or the species that rely on them from these management activities, nor does it provide the scale on which they will occur. Serious questions to be asked in the FEIS include: to what type of vegetation does this statement refer? Exactly how will sagebrush communities be manipulated? What are the expected impacts from treatment of these communities?

Response: Impacts from livestock grazing on sagebrush and riparian communities, as well as those associated with wildlife habitats, are discussed in the revised Chapters 4.16 Vegetation, and 4.22, Wildlife and Fisheries.

Comment Number: #30-8

Comment: What are intensive grazing management techniques that can slow or reduce spread of annuals (page 3-76)?

Response: Section 3.17.1.7 has been rewritten and includes clarification regarding the treatment options for slowing or reducing the spread of annuals: "Tightly controlled livestock grazing, prescribed fire, and seeding of native plants—coupled with full suppression of high-intensity wildfires—can slow, and in some cases reverse, type-conversion to exotic annual grasslands".

Comment Number: #30-22

Comment: Livestock grazing should be excluded from treated areas for up to ten years following juniper treatment to ensure recovery of native vegetation and avoid rapid introduction of invasive weeds onto the site.

Response: Where livestock rest is necessary after juniper treatment, the appropriate amount of time for rest will be determined on a site-specific basis.

19.9 General Vegetation Comments

Comment Number: #23-9

Comment: Desired Plant Communities should be included in wildlife section. In the Vegetation section, desired plant communities need to be defined by the five general plant communities and, in the wildlife section, desired future condition needs to be identified by the five plant communities and tiered to specific species of state resource plans. Desired plant communities and conditions for key wildlife habitats are identified on page 6 of comment letter.

Response: BLM agrees that DFCs are an important point; however, given the complexity of this issue, we would like to meet with the state game agencies to resolve this issue. This issue will necessitate having not only biologists, but experts in soils, vegetation, and range management in order to come up with DFCs based on local capabilities. The examples sent to this office are an excellent starting point but will need to be refined based on new soils data and vegetation capability. SOPs are provided throughout the EIS including, but not limited to, salting restrictions, fencing designed relevant to big game needs, and designing livestock watering facilities that do not negatively impact wildlife or riparian habitats.

Comment Number: #23-19

Comment: It's difficult to determine the data that support the rate of restoration of vegetation.

Response: Ecosystem-based planning, implementation, and monitoring will be utilized to assess vegetation health and determine restoration levels in the SFO planning area. Based upon on our past experience in balancing site needs with resource needs, heavy reliance on ongoing site assessments, and our current restoration efforts (and results), we believe the proposed management actions will show progress toward the vegetation restoration goals and objectives in the PRMP / FEIS.

Comment Number: #23-20

Comment: Introduction of fire and continuation of livestock management into these communities without the benefit of approved Guidelines, utilization limits, form class and other factors leave very few assurances that wildlife habitat will be maintained or restored. Many key terms used in Vegetation section are not defined (examples given). Lack of Standard Operating Procedures for major uses leave wildlife as an obscure goal.

Response: Sections 2.8 and 2.15 of the Proposed RMP outline proposed management actions for fire management and livestock grazing, in accordance with approved BLM policy, standards, and guidelines. Standard Operating Procedures (SOPs) are an integral part of the RMP, found within various guiding documents such as BLM manuals, conservations strategies, and other collaborative efforts e.g., sage-grouse, sagebrush and riparian conservation plans**.** The definition of the terms potential natural vegetation, desired plant community, healthy, and proper functioning condition are found in the Glossary.

Comment Number: #23-40

Comment: Nevada Conservation Strategy Plan identifies 27 habitat types across the landscape. The RMP should assess the composition of these habitat types and establish a priority based upon threats and issues per species.

Response: The Nevada Conservation Strategy Plan was not published until after the Draft RMP was developed. BLM was therefore not able to correlate the 27 habitat types with vegetation modeling that was already completed for the land use planning effort.

Comment Number: #23-41

Comment: We are not aware of studies within the influence of this plan that support assumptions provided (recovery rates for Wyoming and Big Basin sage brush are estimated at 40 and 50 years, respectively). Nevada's Comprehensive Wildlife Conservation Strategy describes state's composition of these communities and the RMP should determine its influence and priority on future management with respect to the landscape.

Response: We have deleted the text in Section 3.17.1.6 of the Proposed RMP that stated the fire intervals relayed in comment, and replaced them with fire intervals for Wyoming and basin big sagebrush as per Section 3.6.2.2 Fire Ecology.

BLM was provided a copy of Fire and Restoration of Sagebrush Ecosystems (Baker 2006) by NDOW. While Baker reached a different conclusion on fire intervals, he did provide other research as evidence of these estimates for Wyoming big sagebrush as follows: "Summaries of mean fire interval for Wyoming big sagebrush have included 50 or 60 years on the low end (e.g., Miller 2002, United States Department of Interior 2002) or even 12–50 years for some stands (Miller 2002)". Baker also stated later that "Together these limited data suggest that full recovery of Wyoming big sagebrush may be quite variable but generally requires 50–120 or more years." In addition, Miller and Tausch (2002) provide data that the fire interval was 50-100 years for Wyoming big sagebrush. The reference for Basin big sagebrush appears to be incorrect and should instead refer to Mountain big sagebrush which Miller and Tausch estimate has a fire return interval of 15-25 years and Baker estimates recovery times of 35-100 years. In reference to Basin big sagebrush, current observations indicate that Basin big sagebrush has a recovery rate of as little as 15 years. The Surprise Field Office will continue to research fire interval and recovery rates and continues to appreciate your continued input into this matter.

Citation: Miller, R.F., and R.J. Tausch. 2001. The role of fire in pinyon and juniper woodlands: a descriptive analysis. Pages 15–30 in K.E.M. Galley and T.P. Wilson (eds.). Proceedings of the Invasive Species Workshop: the Role of Fire in the Control and Spread of Invasive Species. Fire Conference 2000: the First National Congress on Fire Ecology, Prevention, and Management. Miscellaneous Publication No. 11, Tall Timbers Research Station, Tallahassee, FL.

Comment Number: #23-43

Comment: Mountain browse species and communities need clear delineations and management actions to support big game species.

Response: Vegetation polygons are not fine-scale mapped for the Surprise Field Office. Soils data were used to estimate percentages of habitat that occur. The vegetation section has management actions outlined although not specifically for big game. Besides adhering to BLM standards for rangeland health, the Surprise Field Office will be using partner publications such as "Birds in a Sagebrush Sea" and both the California and Nevada wildlife action plans to ensure that vegetation meets the needs of wildlife.

Comment Number: #24-20

Comment: Supports preferred alternative for vegetation, which they understand is crafted to allow for implementation of "Restoration of the Sagebrush Steppe and Associated Ecosystems in Northeast California and Northwest Nevada through Improved Management of Western Juniper and Other Natural Resources" EIS currently being developed. RMP should include statement supporting implementation of that document.

Response: Thank you for your comment. We appreciate your support of the preferred alternative, which will incorporate management guidelines from the "Restoration of the Sagebrush Steppe and Associated Ecosystems in Northeast California and Northwest Nevada through Improved Management of Western Juniper and Other Natural Resources, once it is completed.

Comment Number: #25-18

Comment: The DEIS fails to disclose how habitat conditions, and thus wildlife populations, have changed due to conversion of native vegetation to crested wheatgrass or other non-native species. How has such conversion influenced habitat? What are the impacts?

Response: Chapter 4 references impacts of crested wheatgrass on wildlife and specifically references certain species groups such as wild ungulates and sage-steppe birds; see Section 4.22. The discussion of Incomplete or Unavailable Information in Section 4.22 also states that trend information does not exist locally for most species but that adequate information does exist to predict consequences of management actions.

Crested wheatgrass was planted in previous decades (on about 3% of the SFO) after fires and as a method to feed livestock on lower elevation ranges. Areas planted were predominantly in pronghorn antelope winter and yearlong habitats although greater sage-grouse, various sage-steppe birds, and pygmy rabbit likely were also found in these areas. The exact adverse affects of these plantings on wildlife are not known beyond the obvious loss of forage and cover for various native species. Section 2.15.5 states "Crested wheatgrass communities will be maintained where in a healthy and productive condition (36,740 acres); however, crested wheatgrass stands in poor condition (8,400 acres) will be restored to native vegetation." The overall adverse impacts to wildlife would be negligible due to the small percentage of BLM administered lands that would remain as crested wheatgrass seedings.

Comment Number: #25-26

Comment: There is no disclosure as to the amount of range improvements in the form of vegetation treatments and conversions to non-native species.

Response: We believe these were sufficiently identified in the description of proposed management actions under the preferred alternative in the Draft RMP EIS; and have been carried forward in Section 2.15.5 of the PRMP / FEIS.

Comment Number: #26-41

Comment: Request that BLM add animal impact [as a method of vegetation control] to the list at 2.16.10 (paragraph 1, last sentence).

Response: The use of biologic treatments (including grazing or animal impact) has been added to the PRMP / FEIS in Section 2.15.5.

Comment Number: #27-6

Comment: Cumulative impacts to native plant communities and rare plants and animals from historical (and some ongoing) catastrophic disturbances (forest clearing, range improvement, policy of spraying millions of acres of sagebrush with phenoxy-based herbicides during 1940s though 1960s, seeding with non-native pasture grasses) must be analyzed in the EIS in light of this latest proposal to reduce native juniper forests.

Response: As stated in Section 2.15.5 "Historic juniper woodlands will be maintained on land to which it is native (17,500 acres).

Chapter 4 references impacts of crested wheatgrass on wildlife and specifically references certain species groups such as wild ungulates and sage-steppe birds; see Section 4.22. The discussion of Incomplete or Unavailable Information in Section 4.22 also states that trend information does not exist locally for most species but that adequate information does exist to predict consequences of management actions. Crested wheatgrass was planted in previous decades (on about 3% of the SFO) after fires and as a method to feed livestock on lower elevation ranges. The overall adverse impacts to vegetation and wildlife would be negligible due to the small percentage of BLM administered lands that were seeded, or would remain as crested wheatgrass seedings.

Comment Number: #30-6

Comment: Why is cheatgrass not included on list and map of noxious weeds?

Response: Noxious weeds are so designated by State or Federal regulation, with attendant restrictions on movement and control requirements. Cheatgrass is an invasive plant species, but is not listed as a noxious weed by California, Nevada, or the Federal government.

Comment Number: #30-23

Comment: Recommends that BLM develop a programmatic management plan and EIS to help guide development of plans (in multiple western states), identify best management practices, and avoid duplication of effort.

Response: BLM believes that management of invasive juniper is best accomplished through decisions made at the field-office level, in consideration of all local factors. However, management would be accomplished in accordance with the requirements of appropriate programmatic documents and policies, including EIS for Vegetation Treatment in 13 Western States and the Draft Sagebrush Steppe Ecosystem Restoration EIS.

Comment Number: #34-7

Comment: Suggest that somewhere in section that “chemical treatments” be explained (page 2-83, Ch. 2.16.10).

Response: Chapter 2.16.5 of the PRMP / FEIS under “Proposed Management Actions” bullet 6 states “Employ chemical treatment (using approved herbicides) where fire, mechanical, and/or biological methods are not adequate or feasible”.

20.0 VISUAL RESOURCE MANAGEMENT

Comment Number: #11-11

Comment: Estill opposes preferred alternative to establish various VRM zones within all 6 of his allotments to extent it intends and/or is interpreted and applied to limit/close any motorized access to facilitate the livestock operations upon the 6 allotments and to limit/restrict/close maintenance and/or construction of range improvements to manage the livestock upon the public lands.

Response: The VRM class objectives assigned under the preferred alternative would not create restrictions and/or buffers to adjacent private lands, or the right (directly or indirectly) to manage or otherwise influence uses of private property, even property found within or adjacent to a VRM Class I area.

Comment Number: #14-43

Comment: Describe visual resources management conditions as currently designated in existing MFPs and adopted in Alternative 1.

Response: Under the no action alternative VRM management would continue under terms of existing management plans and subsequent amendments. The assignment of formal VRM classifications, or management imperatives, is not recognized except in WSAs and on the Madeleine Plains watershed.

Comment Number: #17-12

Comment: The designation of visual buffer zones for a minimum distance of three miles on either side of all major travel routes or classification of a VRM as Class II or Class III should not require modification of existing facilities or structures, relocation of existing facilities or structures, or a substantial change to existing utility corridors or reasonably foreseeable future facilities.

Response: The Proposed RMP does not include any proposed management actions that would require a 3-mile buffer zone for visual resources.

Comment Numbers: #18-8, 19-88

Comment: Should Congress choose to release any areas from WSA status, recommend that Surprise RMP provide some specific measures for their continued protective management: VRM classification, ORV route designation, and energy and mineral designations should receive consideration with a strong focus on the need to supply protective measures. In general, support WSA management common to all alternatives (pages 2-66 through 2-69). However, would prefer that management prescriptions be more specific in event any lands are released by Congress from WSA designation. Specifically, VRM classification, ORV designation, and energy and mineral designations should be addressed with strong consideration given to applying protective measures.

Response: Should any areas be released from WSA status, BLM believes that they would be protected through the following measures that are already in place under the proposed action: OHV use would be limited to designated routes; new energy or minerals development would require additional project- and site-specific NEPA reviews with the potential for more restrictive stipulations; and management under VRM class similar to the surrounding area, many of which are Class II (see also discussion in Section 2.13 of PRMP / FEIS). In addition, under the preferred alternative, BLM would actively pursue acquisition, from willing landowners of non-public lands within and adjacent to WSAs, and assess these lands for wilderness values; an amendment to the RMP would be completed to permit management under the Wilderness IMP.

Comment Number: #19-92

Comment: BLM should carry the VRM classification management for all five WSAs through to the Final document.

Response: Management of WSAs under VRM Class I objectives has been carried through under the preferred alternative in accordance with the Wilderness IMP and BLM VRM policy. VRM classes have been assigned by BLM using the VRM inventory process described in Chapter 2.18.

Comment Number: #19-100

Comment: Manage all primitive areas as VRM Class I and SPNM zones as VRM Class II.

Response: There are no areas classified as "primitive" within the more than 1.2 million acres of public land that SFO manages; the urban class is the other class not represented. The only places within the SFO jurisdiction that are designated as VRM Class I under BLM's VRM requirements are the WSAs (183,587 acres or 15% of entire SFO management area). Class II is the highest level that can be applied outside of WSAs, and retains the character of the existing landscape. Under the preferred alternative there are135,000 acres classified as "semi-primitive non-motorized", and these are identified as VRM Class II.

BLM believes that the preferred alternative includes the most appropriate mix of management measures to adequately visual protect resources, while also considering the relative significance of the public land products, services, and use to local economies.

Comment Number: #26-42

Comment: One policy to help keep an unaltered view shed in place is for BLM to work toward a healthy livestock industry. As it becomes less profitable to run livestock on BLM land, ranchers tend to sell their scattered parcels and land uses are replaced by activities less pleasurable to see.

Response: Thank you for your comment. As part of BLM's public land management responsibilities, values including both visual resources and livestock grazing are considered when making or providing input to any decision within our authority.

21.0 WATER QUALITY AND HYDROLOGIC FUNCTION

Comment Number: #20-8

Comment: FEIS should describe how streams not meeting water quality standards will be incorporated into plans for exclosures and other mitigation methods under the preferred alternative.

Response: Best Management Practices (BMPs) would include restorative measures that would be prescribed and implemented based upon site-specific conditions and requirements; this would include BMPs for corrective actions for Section 303(d) listed waters, endangered species, and other sensitive-wetland and riparian areas. As specific plans are developed – such as allotment management plans (AMPs) or Habitat Management Plans (HMPs), they would incorporate appropriate BMPs. Important BMPs would include protection of streams, wetlands, spring sources, and uplands from overgrazing by livestock through management actions such as range improvement projects to changes in current grazing practices or complete livestock exclusion where this is advisable. BMPs will be developed and implemented on a site-specific basis for those streams not meeting water quality standards.

Comment Number: #20-9

Comment: FEIS should discuss monitoring to comply with Guideline 12 in Appendix C (protection of water quality).

Response: Indicators of OHV impacts are primarily from visitor use data, the condition of existing roads and trails as monitored by BLM resource specialist, and contact with visitors who use the public lands. Impacts will also be assessed by monitoring disturbance of cultural sites, erosion of roads and trails, BLM law enforcement patrol and during rangeland health assessments. The development of a Surprise Field Office OHV Master Plan will also include monitoring of OHV impacts. Under the Draft RMP Section 2.14 Travel Management, 2.14.4 Management Common to All Alternatives, the last sentence states that "OHV management must also comply with recommended guidelines established by the Resource Advisory Council (RAC) (Appendix C).

Comment Number: #21-5

Comment: Wildlife friendly fences or enclosures should be constructed to protect springs, streams, riparian, and other habitats from livestock grazing. Provides specific recommendations for fencing.

Response: BLM will construct new fencing and protective exclosures to protect special habitat from livestock and wild horse grazing where appropriate. All new fencing would be built to wildlife specifications. We appreciate your comment and fencing recommendations; however, BLM has its own set of specifications that would be followed.

Comment Number: #23-16, #23-25

Comment: Nevada BLM develops best management practices to mitigate and protect wildlife habitat. Could not find the BMPs in the text or appendix. Narratives for water quality suggest that BMPs will be developed and are not known.

BMPs must be included to meet requirements for this land use plan.

Response: The Nevada Handbook of Best Management Practices (as revised in 1994) represents a combined effort of the Nevada Division of Environmental Protection and the Nevada Division of Conservation Districts. Most of the material in the handbook was developed from many sources including BMP handbooks and technical guides from the USEPA, NRCS, USFS, BLM, and the Tahoe Regional Planning Agency, as document in the Acknowledgements section of the Nevada Handbook of Best Management Practices.

BMPs are discussed in general terms, relative to water quality, in Section 2.19; however, specific BMPs would be and implemented based upon site-specific conditions and requirements, as directed in the Purpose and Use section of the Nevada Handbook of Best Management Practices. The handbook states "Effective BMPs must be based on consideration of all existing site specific conditions and must be cost effective. Factors which need to be considered include the occurrence and movement of surface and ground water, soil type, climate, topography and habitat. BMPs should be designed and developed on a site specific basis by qualified professionals". All BLM programs and activities having the potential to degrade water quality would include BMPs as an integral part of activity plans. BMPs would be chosen from various state approved documents including, but not limited to: Water Quality Management for National Forest System Lands in California Best Management Practices, (Sept 2002); Soil and Water Conservation Practices Handbook, USDA-Forest Service Southwestern Region (FSH 2509.22 R-3 Transmittal), (effective 12/3/90) and the Nevada Handbook of Best Management Practices as revised in 1994.

A list of BMPs is not a requirement of the land use plan.

Comment Number: #23-23

Comment: Text should define desired water quality standards, acceptable water quality for beneficial use, and hydrologic function objectives.

Response: We believe that defining water quality goals and objectives in terms of state water quality and BLM standards (see Section 2.19.3) is appropriate for the programmatic nature of this RMP. These objectives would be pursued by implementing the proposed management actions in Section 2.19.5 at the activity plan level.

Comment Number: #23-24

Comment: Support the instream flow concepts to support riparian and aquatic habitat. Effort might require a management action that would include joint filings for water rights to support riparian habitat.

Response: Proposed management actions under the preferred alternative include the assertion of instream flow rights in Nevada and riparian rights in California on perennial and important intermittent streams. BLM water rights policy is based on IM CA-2000-014, "Interim Water Rights Policy for Public Lands in Nevada Administered by BLM-California"; IM NV-2005-077 "BLM Nevada Water Rights Policy"; BLM Handbook H-7250 (Water Rights); and BLM Handbook Supplement H-7250-1 (California Water Rights Procedures).

As instructed by "IM NV-2005-077 BLM Nevada Water Rights Policy", BLM-Nevada will adhere to substantive and procedural requirements of State law as required by Departmental policy. Accordingly, BLM-Nevada will not file new applications with the State Engineer for permits to appropriate water(s) for the purpose of watering livestock on public lands. BLM may determine it desirable to file an application for any beneficial use other than livestock water at the time of a non-BLM entity's application for livestock water. In such a case federal funds may be expended for the development, operation, and maintenance of the BLM portion of the development. It is encouraged (not required) that BLM include its application at the same time (preferably in the same envelope) with the non-BLM entity's application so that both applications receive the same priority date and time. Beneficial uses recognized by the State of Nevada include: wildlife (including wild horses and burros), the establishment and maintenance of wetlands, fisheries and other wildlife habitats, recreation, quasi-municipal, irrigation, domestic, environmental, and storage.

Comment Number: #25-16

Comment: BLM must show that benefits of domestic livestock grazing out-weigh the costs to comply with Multiple Use Sustained Yield Act (MUSYA). DEIS fails to disclose any of the direct, indirect, or cumulative impacts associated with domestic livestock grazing from proposed management direction under any of analyzed alternatives. DEIS analysis of impacts is less than 1/2 page on page 4-77.

Response: MUSYA does not apply to BLM; therefore, BLM is not required to include such a discussion in the RMP. Impacts from livestock grazing are addressed in Chapter 4 under each of the various resource areas that could be impacted by grazing (for example, vegetation or wildlife). The referenced page (in Section 4.8) presents the evaluation of impacts on livestock grazing from the proposed management actions. See Chapter 4 of PRMP / FEIS.

Comment Number: #25-19

Comment: Reduced quality of streams and wetlands in planning area likely due to domestic livestock grazing. DEIS fails to disclose what management activities are responsible for such widespread failure to meet standards of rangeland health and other legal requirements. Commenter cites studies to support conclusions.

Response: Impacts from livestock and wild horse grazing on riparian communities, as well as those associated with wildlife habitats are discussed in the revised Chapters 4.16 Vegetation, and Chapter 4.22 Wildlife and Fisheries.

Comment Number: #29-22

Comment: Request to delete language under Water Quality preferred alternative re limits to allowing public uses and activities along streams and around water bodies. Offers possible replacement sentence. Commenter believes that last two sentences in Section 2.20.10 should be deleted as sentence that precedes them and management actions common to all alternatives adequately cover necessary management actions to maintain water resources and state compliance.

Response: ELFO response to this comment said: The text in Chapter 2.19 Water Quality has been revised to state: "Various uses and activities will be allowed within streams, riparian areas, and contributing uplands as long as they do not impede progress toward attaining water quality standards or the goals and objectives for riparian habitats. For streams with quality-impaired segments, or lakes not meeting water quality standards, allowable uses must not interfere with restoring water quality to standards set by the State.

Comment Number: #34-9

Comment: Recommend that preferred alternative include "construct fences or exclosures to protect springs, streams, and riparian areas." (2.20.10, page 2-98)

Response: The proposed management actions have been revised to include the following action: "Protecting uplands, springs, streams, riparian areas, and wetlands from grazing by employing and maintaining protective exclosures."

Comment Number: #36-1

Comment: No plans are outlined for BMP implementation or other corrective actions for 303(d)-listed waters, endangered species, or sensitive areas–wetland and riparian areas. For example, if a water body is 303(d)-listed for pathogens or nutrients, what is the formal process to verify the impairment and/or correct the problem?

Response: SFO has no 303(d)-listed waters. However, if any are identified, water quality monitoring would be conducted to determine site-specific BMPs would be developed and implemented to correct the problem. The issue of a formal process to verify the impairment and/or correct the problem will be addressed in the MAA that is currently being developed by the BLM California State Office and the California State Resources Control Board.

Restorative measures would include best management practices (BMPs) that would be prescribed and implemented based upon site-specific conditions and requirements; this would include BMPs for endangered species and other sensitive wetland and riparian areas. As specific plans are developed or revised, such as allotment management plans (AMPs), habitat management plans, and Herd Management Area plans, they would incorporate appropriate BMPs. Section 2.19 does list some important BMPs which are also identified here. Important BMPs would include protection of streams, wetlands, spring sources, and uplands from overgrazing by livestock through everything from improvements to current grazing practices through complete livestock exclusion where this is advisable. Also, bio-engineering projects would include intensive planting of woody vegetation along stream banks plus other forms of (riparian) vegetation manipulation and stream bank stabilization structures – such as placing downed juniper for erosion control. BMPs will be monitored, evaluated, and modified as necessary through an iterative process to meet water quality criteria and other resource management objectives. For example, the iterative process relating to water quality would likely include design of BMPs based on site-specific conditions, technical, economic, and institutional feasibility, and the water quality standards of those water potentially impaired sites; monitoring to ensure practices are correctly designed and applied; monitoring to determine effectiveness and appropriateness; and adjustment of BMPs if level or protection is not at desired level.

Comment Number: #36-2

Comment: Monitoring has shown that livestock, especially cattle, must be excluded from surface waters if fecal coliform standards are to be met. Suggests that exclusion fencing be utilized extensively around surface waters, and that off-stream watering facilities be developed, rather than allowing direct access.

Response: We agree with the importance of excluding livestock from surface waters for the protection of water quality and will conduct water quality monitoring to assess site-specific conditions and identify causes where fecal coliform has exceeded state standards. Site-specific BMPs will be applied to correct the problem. The SFO will maintain 5,500 acres of existing livestock exclosures. An additional 2,000 acres of new livestock exclosures would be considered when no other practical or affordable options exist for mitigation of grazing effects. Whenever possible, existing infrastructure (pasture and allotment fences) or topography would be used to minimize construction of additional fencing, even if this increases the area from which livestock are excluded. The new exclosures would be required to mitigate livestock impacts on special habitats, water quality, and archaeological sites as a result of increased livestock distribution. Meadows and aspen stands of significant value to wildlife will receive priority for additional livestock exclusion. When fencing natural water sources, water would be provided outside exclosures for livestock, wildlife, and wild horses. Prescribed grazing may be allowed on these areas if needed to maintain vegetation vigor and diversity.

Comment Number: #36-3

Comment: Sheep require different management—location of the base camp is more important. Sensitive areas should be excluded from grazing by locating the base camps at least ¼ mile from these areas, and herding to avoid. Watering of sheep directly in surface waters is not as much of a problem as with cattle.

Response: BLM regulates trailing and bedding areas and there are permit stipulations for no camping on watering holes and sensitive habitat areas. Currently, there are only 3 sheep allotments within the SFO. At this time we do not have any information or data that supports sheep camps are contributing to degrade water quality conditions, or not meeting rangeland health standards. If information becomes available, then sheep camp restrictions would be stipulated, as a term and condition of a grazing permit. We will continue to monitor livestock movements and water quality and consider the implementation of BMPs, as needed and appropriate, should problems arise in the future or the numbers of sheep or allotments increase.

Comment Number: #36-5

Comment: What sort of monitoring program will be used to verify compliance with State water quality standards? No monitoring program, protocol, or concrete process for developing monitoring plans is given.

Response: SFO has established water quality sampling stations and identified baseline conditions. The water quality monitoring program will be addressed in the Water Quality Management Plan and Management Agency Agreement (MAA) that is currently being developed by the BLM California State Office and the California State Resources Control Board. BLM monitors for compliance with the state water quality standards, and we will adapt the monitoring plan as soon as the MAA is completed.

Comment Number: #36-6

Comment: A number of waters are listed as being in violation of State standards, yet no formal process is in place to notify the Regional Board when monitoring results show that standards have been violated. BLM relies primarily on the Water Quality Control Board to identify impaired waters or high probability of impaired water. However, if BLM is sampling these waters and Lahontan staff does not receive the data, how is Lahontan staff to determine if waters are impaired or not? There clearly needs to be a formal process for sharing of monitoring data. Perhaps could be addressed in Statewide MAA being developed by BLM and State Water Resources Control Board. Need to set up meeting and coordinate further on data collection and sharing.

Response: A formal process to verify any impairment and / or correct any problem will be addressed in the MAA that is currently being developed by the BLM California State Office and the California State Resources Control Board. The SFO is waiting for the MAA to be completed and a formal process to be developed so water quality data collected can be shared between both agencies.

Comment Number: #36-7

Comment: Essential fecal coliform data from the AMS was not included in the report, but should be. For example, data of fecal coliform for the Susan River at Hobo Camp suggests that it is an impaired waterbody for pathogens.

Response: Additional water quality information, including data on fecal coliform, has been added to Section 3.21, Water Resources.

22.0 WATER SUPPLY

Comment Number: #7-24

Comment: Prioritize wildlife needs and natural hydrologic functioning over reservoirs, livestsock ponds and other water diversions.

Response: We agree and believe that this prioritization has occurred in the SFO and will continue to occur under the preferred alternative.

Comment Number: #11-34

Comment: Rejects application by USDI or BLM to apply for any water rights that are not consistent with law or intend to subordinate water rights of Estill.

Response: BLM would not apply for any water rights that are not consistent with law nor do we intend to subordinate the water rights of the commenter/permittee. We have not identified any water rights issues in this regard and note that the commenter still has permits in SFO planning area.

As instructed by "IM NV-2005-077 BLM Nevada Water Rights Policy", BLM-Nevada will adhere to substantive and procedural requirements of State law as required by Departmental policy. Accordingly, BLM-Nevada will not file new applications with the State Engineer for permits to appropriate water(s) for the purpose of watering livestock on public lands. BLM may determine it desirable to file an application for any beneficial use other than livestock water at the time of a non-BLM entity's application for livestock water. In such a case federal funds may be expended for the development, operation, and maintenance of the BLM portion of the development. It is encouraged (not required) that BLM include its application at the same time (preferably in the same envelope) with the non-BLM entity's application so that both applications receive the same priority date and time. Beneficial uses recognized by the State of Nevada include: wildlife (including wild horses and burros), the establishment and maintenance of wetlands, fisheries and other wildlife habitats, recreation, quasi-municipal, irrigation, domestic, environmental, and storage.

Comment Number: #16-4

Comment: There are significant water resources that may be affected by this RMP, particularly as they affect Tuledad Creek, Wall Canyon Creek, Lost Creek, and some of the other streams that drain into the Duck Flat. The RMP and EIS should be revised to reflect Companies priority and vested rights to its water resources. All private land owners should not be prohibited, for example, from transporting its water from its property through public lands. The planning document should include a statement confirming in all of the proposed ACECs that right of way permits may be issued without additional restrictions.

Response: BLM has no authority on private land and the rights of private landowners would continue regardless of adjacent land use designations. Owners of private land surrounded by public land (managed under the FLPMA) would be granted access across public land to permit reasonable use of their property. Rights-of-way established across public lands prior to the passage of the FLPMA would be recognized as a valid use. ACECs have been designated as such as per BLM policy to manage and protect unique and important resources, including cultural resources, scenic resources, sensitive vegetation, and important wildlife habitat. Due to the sensitive nature of these relevant and important resources, all ACECs have been designated as ROW avoidance areas. This means that any applications for new ROWs or utility corridors would undergo a site-specific NEPA review, and would only be granted if BLM concurs 1) the only feasible location is within the ACEC, and 2) no relevant and important resources would be adversely affected. It is incumbent on the ROW applicant to investigate and document that the only feasible location is within the ACEC. BLM will utilize the applicant's documentation to evaluate concurrence.

Comment Number: #23-10

Comment: Support restoration of riparian systems by designing water developments to support riparian systems rather than export water to stock tanks.

Response: We agree and believe that this prioritization has occurred in the SFO and will continue to occur under the preferred alternative.

Comment Number: #29-6

Comment: Requested revision to Alternatives Summary table, under water resources: projects that involve inter-basin transfer of water would be coordinated and consistent with the local water resource policies and plans of local and regional governments.

Response: After careful consideration, we have decided not to change the language regarding interbasin transfer of water.

Comment Number: #34-10

Comment: Recommend including explanation of "instream" and "riparian" rights at this location or other appropriate location in document (2.21, page 2-99).

Response: These concepts have been added to the Glossary in the proposed RMP.

Instream Flow Rights — A doctrine used to preserve minimum river or stream flows for fish and wildlife, recreation, water quality, and scenic beauty, among other public purposes. Such rights are limited to the use of water within its natural course, not requiring diversion.

Riparian Water Rights – The rights of a land owner to the water on or bordering his property, including the right to prevent diversion or misuse of upstream water. They differ from state to state and often depend on whether the water is a river, lake, or ocean. The doctrine of riparian rights is an old one, having its origins in English common law. Specifically, persons who own land adjacent to a stream have the right to make reasonable use of the stream's natural flow on those lands within the watershed.

23.0 WILD HORSES AND BURROS

Comment Numbers: #7-18, #23-45

Comment: One commenter said to maintain 50 minimun wild horse head to keep genetic diversity and no fertility control other than adoption. Another stated that AMLs on indicated herds that are below 120 adults are deemed below a genetic threshold. Recent studies show these herds cannot survive over long term and should be considered for elimination in the new RMP.

Response: BLM's goal under the proposed action is to manage wild horses at appropriate management levels (AMLs) within the established herd management areas. There are various opinions about the minimum number of animals necessary to maintain genetic diversity within a herd.

In northeastern California and northwestern Nevada, separate herds may have AMLs lower than 50 or 120 head, but in reality, the HMAs are located adjacent to one another and horses from any of the HMAs intermingle / drift between adjacent HMAs, with natural mixing of genetic traits. Managing four of the eight HMAs as a unit (Nut Mountain, Bitner, Massacre Lakes, and Wall Canyon complex) under the preferred alternative will facilitate genetic exchange and result in healthier animals. Under existing BLM policies, following the gathering of an HMA, blood samples are taken for genetic analysis of wild horses. These data, along with the general condition and appearance of the wild horses, are used to determine genetic diversity and type of actions (if any are necessary) to keep the populations self-sustaining. Currently, horses from HMAs in this area are not exhibiting signs of in-breeding, the typical concern with decreased genetic diversity.

Comment Number: #7-19

Comment: Monitor adoption procedures to make sure followed in accordance with Wild Horses and Burro Protection Act.

Response: Thank you for your comment. Adoption procedures are clearly defined. BLM employees, friends, and family follow the same adoption procedures and requirements as all adopters.

Comment Number: #11-12

Comment: Estill does not oppose preferred alternative to ratify/establish herd management areas within all 6 allotments as related to ratifying boundaries of existing Coppersmith, Buckhorn, and Fox Hog HMA. However, Estill opposes enlargement of the Fox Hog HMA within the Bare Allotment, for reasons provided in subsequent comments.

Response: The original existing boundaries on the west side of the Fox-Hog Herd Management Area were established on straight township lines on a map, without regard to natural topographic features or pasture fences, which obviously does not represent herd management on-the-ground. The remaining boundaries in the Fox-Hog herd which were established on fencelines or by natural boundaries, as typically occurred for most herd management area boundaries. The herd area was enlarged by moving the boundaries out to existing fencelines. Based on census information, wild horses have been actually using these areas since 1970's. The net result is an overall increase of 48,226 acres, or about 2% for total herd area managed by the Surprise Field Office. The preferred alternative does not change existing AMLs.

Comment Number: #21-14

Comment: The grazed area for wild horses and burros should not be increased from 36% to 40% as increasing the number may adversely affect fish and wildlife.

Response: As recognized in Chapter 4, the continued unmanaged presence of wild horses will have significant adverse impacts on wildlife due to degradation of important riparian summer habitats and wintering areas. However, maintenance of herds within strict AMLs limits will lessen these effects and benefit wildlife. In addition, the preferred alternative (as does regulations and policy) allows for BLM to reduce AMLs (on the basis of monitoring) to permit recovery of riparian and upland vegetation, wildlife habitats, and soils to achieve BLM land health standards. The actual increase in overall herd management is 48,226 acres or 2%. While the herd area size will significantly increase for Fox-Hog Herd Management Area, *this increase in area is an administrative adjustment since the horses have been using the areas prior to 1980.* The Surprise Field Office currently only manages for wild horses and does not have an AML for burros. Also refer to responses to comments #11-12 and #7-18 above.

Comment Number: #23-26

Comment: In specific herd management areas where the appropriate management level cannot support a self sustaining population, the herd should be eliminated. In herd areas that do not have adequate water, cover and forage, these herds should be eliminated. Costs of artificially managing, or herds dependent on private landowners, are an excessive cost to limited budgets for wild horse and burro management.

Response: The herd management areas administrated by the Surprise Field Office have the necessary habitat components to sustain their numbers on a year-long basis, based on evaluations that have been completed in the past. The AML (by definition) is an indication of forage and water availability. Several herds that are seasonal dependent on private water sources have a lower AML. While in the past BLM has conducted emergency gathers during periods of drought, most herds have adequate water available on public lands. Also refer to responses to comments #7-18, #23-44 and #26-20.

Comment Number: #23-27

Comment: Monitoring studies must distinguish ungulate use and impacts for proper adjustments. Failure to properly monitor utilization limits or Guidelines will result in arbitrary allocation of available forage. Studies will be required to adjust and manage for pioneering elk.

Response: If elk herds become established in the field office area appropriate monitoring methods would be implemented. Refer to responses to comments #26-20 below.

Comment Number: #23-44

Comment: Appropriate management levels are established by rangeland monitoring data and these numbers are subject to adjustment during scheduled evaluations. The AMLs of this RMP were determined over 10 years ago and are in need of scheduled evaluations.

Response: While most of AML determinations are over 10 years, we believe these AMLs are reasonably accurate. There are several AML evaluations that have occurred since FY2000, and one herd (Massacre Lakes) is scheduled for completion in 2007. We agree that reassessments and adjustments are necessary to validate an AML, and the preferred alternative states that the assigned AML would be reduced if a recovery plan becomes necessary (due to emergence of a new land health issues).

Comment Number: #23-46

Comment: Standard operating procedures should be presented to schedule evaluations, procedures to establish carrying capacities, and allocate the available forage for wild horses and burros.

Response: Reassessments are implemented following guidance from BLM policy and regulations, but can be limited by funding and workload constrains. We do not agree that standard operating procedures are necessary to schedule evaluations. Also refer to responses to comments #21-14 and #23-44, above.

Comment Number: #26-20

Comment: Observed (from looking at maps GRZ-1 and WHB-1) that those allotments that are moving toward but not yet meeting standards have horses on them. It would appear that damage done to the riparian of these allotments, which prevent them from meeting standards, could be possibly the result of wild horse use. Feel livestock industry has taken blame and financial loss due to the agencies and public's inability to properly manage wild horses. Raise a number of questions relating to lumping of use by livestock and wild horses, number of wild horses in relation to that prescribed, documented damage to riparian areas by wild horses, repaired fences torn up by wild horse, etc. BLM must manage its commitments in order to successfully meet riparian and utilization goals and standards.

Response: See individual responses below relating to specific questions raised in the comment:

Has livestock use and wild horse use been lumped together?

Wild horse grazing impacts are considered along with impacts from livestock in a multiple use context, however, during the allotment evaluation process, livestock and wild horse grazing use is normally divided on a percentage basis. Wild horse use is determined by using population estimates on a yearlong basis, unless seasonal distribution information is available. Livestock use is determined by actual use reports and field records by allotment, pasture, or use area basis. In a few instances, livestock or horse use can be separated if measured at variously times during the year. For example, in allotments with multiple pastures, utilization levels would be measured prior to livestock entering a pasture to determined utilization by wild horses; then livestock use would be measured when they are gathered from a pasture, and lastly utilization levels would be measured at the end of the year to determine additional wild horse use.

Has BLM documented damage done to riparian areas by wild horses?

We agree that partition of grazing use is important for determining cause and effect interactions. Monitoring information is analyzed and evaluated to determine what actions are necessary to make process toward meeting rangeland health standards, and are for establishing AMLs for wild horses.

Has BLM kept the horse numbers at levels prescribed?

BLM will continue to gather excess wild horses from HMAs to maintain the populations at the AMLs. As the commenter indicates, the timing of removal actions varies depending upon the availability of funding, labor, equipment, or contractors. Gathers are coordinated on a Bureau-wide basis, and within the past 15-20 years, most of the herds managed by the SFO have been over AML. Currently, 3 of 8 herds managed by the SFO are at or near AMLs; however, the BLM National Strategy Plan for wild horse management is to have all herds at AML by the end of 2007.

Has BLM maintained fences torn up by wild horses?

Generally, BLM has maintenance responsibility for exclosures in HMAs, and the permittees has maintenance responsibility for allotment and pasture fences. In most instances, BLM has maintained fences torn up by wild horses. However, we have found fence damage is caused by a variously reasons, and is not usually entirely contributed to wild horses.

Has BLM maintained their exclosures fences?

Exclosures are built for a variety of purposes. Recently, exclosures have been constructed to protect or enhance riparian values, particularly on those systems not meeting rangeland health standards. We believe improved riparian conditions ultimately benefit the livestock permittees. The SFO generally performs fence maintenance in HMAs, regardless of the circumstances that led to the degraded riparian conditions. Most of the higher priority riparian exclosures are inspected and maintained on annual basis, other exclosures are inspected less frequently.

Comment Numbers: #29-21

Comment: When horse and burro gathers are organized, we urge BLM to bring populations down to the low end of the AML range so that when population builds in succeeding years, it will still hopefully fall within AML range and not exceed it.

Response: Such an approach is part of BLM's management strategy for wild horses (there are no burros within the SFO). As stated in Chapter 2.20 of the PRMP / FEIS, gathering is generally scheduled every 3 to 4 years. Usually, horses are gathered with the objective of reducing numbers to the lower end of the AML. This avoids the need for frequent and expensive gathers and the disruption of the herds. Excess horses are gathered to prevent resource degradation and to safeguard the health of individual herd members. Animals that are gathered are then assessed and either returned to the HMA or designated excess and placed into the adoption program or long-term holding.

24.0 WILDLIFE AND FISHERIES

This section is divided into the following subsections:

24.1 – Federally Listed Species
24.2 – Ungulates
24.3 – Sagebrush-Obligate and Associated Wildlife
    24.3.1 – Sage-Grouse
    24.3.2 – Burrowing Owl
    24.3.3 – Pygmy Rabbit
24.4 – Other Native Wildlife Species
24.5 – General

24.1 Federally Listed Species

Comment Number: #35-27

Comment: Pages 2-109 and 2-110, Cowhead Lake Tui Chub. Klamath office expects to have more information on this species in the near future. They will pass it on to BLM for future management of the species.

Response: Thank you in advance for sharing additional information that you gather on this species.

Comment Number: #35-28

Comment: Page 2-110, Bald Eagle. FWS expects nesting bald eagles to inhabit SFO lands in near future, so recommend BLM develop BMPs and mitigation measures to include in RMP/EIS for how BLM operations will proceed in areas suitable for bald eagle nesting, roosting, or foraging.

Response: The DEIS outlines on page 2-110 management actions that would take place if bald eagles are found nesting on the field office as well as additional work already carried out. BMPs are defined by BLM as "Practices based on current scientific information and technology that, when applied during the implementation of management actions, ensure that adverse impacts are minimized. BMPs are generally tailored to site-specific conditions, in order to represent the most effective and practical means to achieve management goals for a given site." BMPs could be developed depending on the situation and consultation with the USFWS. In addition, any project that may affect a listed species would automatically begin the consultation process. Also, as part of the NEPA process, all projects carried out by the Surprise Field Office are analyzed for wildlife effects and especially T&E compliance.

Comment Number: #35-29

Comment: Page 2-110, Carson Wandering Skipper. Please clarify whether BLM has done survey work for this species. Conflicting information included in document (on pages 2-109 and 2-110).

Response: Because this field office is not thought to contain suitable habitat for this species, no formal surveys have been conducted beyond opportunistic searches during other field work. Potential habitat has been mapped; however, the lack of habitat suitability has not prioritized this species for survey. This language has been clarified in this PRMP / FEIS.

Comment Number: #35-42

Comment: Page 3-105, Warner Sucker. Need to clarify sentence regarding where this species may be found. Suggestions for clarification are provided.

Response: The sentence has been clarified as suggested. Thank you for your comment.

Comment Number: #35-43

Comment: Also for Warner Sucker, page #3-105 refers to “mitigation management”. Commenter questions whether management to reduce impacts really is mitigation management, since mitigation is usually prescribed to address a specific impact. Since the management prescriptions have been designed to reduce or avoid impact to the riparian area, mitigation would not be needed. This should be revised in the document.

Response: The sentence has been clarified to appropriately refer to management actions, instead of mitigation management. Thank you for your comment.

Comment Number: #35-44

Comment: Cowhead Lake Tui Chub (page 3-105 and 3-106). Klamath Falls Office is looking at this species to determine the status. Recommend BLM consider opportunities to enhance habitat for the species and include these in RMP/EIS.

Response: This office is aware of the USFWS's withdrawal of the proposed listing of the Cowhead Lake tui chub. We will continue working with the USFWS on conservation efforts for this species and will add this species to BLM's sensitive species list in order to ensure it receives conservation priority under BLM's regulatory authorities.

Comment Number: #35-48

Comment: In last paragraph at bottom of page 3-114, reference is made to Table 3.19-3 (breakdown of potential and known occupied waters for special status fish species) but table is not included. Table should be added.

Response: The reference in the Draft RMP to Table 3.19-3 is incorrect. A listing of fish species that occur within the SFO is found in Appendix G.

24.2 Ungulates

Comment Number: #11-26, #11-27

Comment: Predation can have significant effect on bighorn sheep; commenter also includes supporting studies for predation. Draft RMP ignores the impacts of predation on bighorn sheep to condition the continued authorization of bighorn sheep use. Other factors that can cause mortality in bighorn sheep have also been ignored in Draft RMP: falls and injury, harvest, poaching, vehicle collisions, wildfire, drought.

Response: While predation can be a significant factor to bighorn it is generally not one that BLM can affect. Predation issues generally fall under the jurisdiction of individual state game agencies. If predation was driven by habitat issues e.g., additional water placement, then BLM would become involved in those decisions. Other factors mentioned are either under the jurisdiction of other agencies to control or enforce; poaching and harvest, or natural variations; wildfire, drought, and injury, and therefore not under BLM’s control. Vehicle collisions are dealt with as part of the ungulate section (and other sections as well) in the RMP and would necessitate seasonal closures or buffer zones if vehicle collisions were to become a problem in the future.

Comment Number: #19-110

Comment: Preferred Alternative does not contain adequate safeguards for bighorn sheep given that domestic sheep grazing will continue in certain allotments unless there is "evidence of disease transmission" between domestic and wild sheep (page 2-119). Urge BLM to adopt the bighorn sheep protection measures described in Alternative 2 (page 2-118) as preferred alternative in the final. This is essential given that bighorn sheep are beginning to enter the Warner Mountains once again. DEIS fails to discuss the positive benefits for bighorn sheep offered by Alternative 3 and the risk for and potential negative impacts on bighorn sheep under the Preferred Alternative.

Response: The Preferred Alternative for bighorn sheep has been changed since the DEIS was published. This new language better follows along with current BLM national guidance for bighorn sheep. While bighorn were historically found on the Warner Mountains, BLM feels that the current alternative allows domestic sheep grazing to continue while keeping more than 80% of bighorn habitats free of domestic sheep. The following is the new language and will be found in the livestock section:

Grazing of domestic sheep would continue on the Tuledad, Selic-Alaska, and Red Rock Lake allotments, unless in the future the current operator elects to convert the livestock kind from sheep to cattle or if the allotments are vacated for reasons unforeseeable at this time. Due to the interest of state game agencies to reintroduce bighorn back into the Warner Mountains, any subsequent request to convert permits from cattle back to sheep would be coordinated with livestock operators and the state game agencies and the status of bighorn re-introduction potential in the South Warner Mountains re-evaluated through the NEPA process. There are no other domestic sheep allotments within the field office area and bighorn sheep have been reintroduced into suitable habitats throughout the field office area therefore no other allotments are permitted for domestic sheep grazing. Trailing may be allowed in allotments closed to domestic sheep grazing in compliance with BLM's "Guidelines for Managing Domestic Sheep and Goats in Wild Sheep Habitats". Voluntary changes or conversions of the permits from domestic sheep to cattle grazing provide the Surprise Field Office the opportunity to coordinate with state wildlife agencies and other cooperators in developing a reintroduction plan for California bighorn sheep prior to reintroduction efforts. Habitat management would focus on producing grasses and forbs in early to mid-seral stage habitats where applicable.

BLM's "Guidelines for Managing Domestic Sheep and Goats in Wild Sheep Habitats" (BLM 1998) provide operational guidance for domestic sheep and goat management in the Field Office. The Guidelines cover many aspects of grazing domestic sheep in the vicinity of bighorns and are listed here. Future revisions to the guidelines would apply also.

"1. State wildlife and Federal land management agencies, native wild sheep interest groups, and domestic sheep and goat industry cooperation and consultation are necessary to maintain and/or expand native wild sheep numbers. When agency and industry agreement has been reached to maintain and/or expand native wild sheep numbers, the agencies and the domestic sheep industry will be held harmless in the event of disease impacting either native wild sheep or domestic sheep and goats.

2. Domestic sheep or goat grazing and trailing should be discouraged in the vicinity of native wild sheep ranges.

3. Native wild sheep and domestic sheep or goats should be spatially separated to reduce the potential of interspecies contact.

4. In reviewing new domestic sheep or goat grazing permit applications or proposed conversions of cattle permits to sheep or goat permits in areas with established native wild sheep populations, buffer strips surrounding native wild sheep habitat should be developed, except where topographic features or other barriers minimize physical contact between native wild sheep and domestic sheep and goats. Buffer strips could range up to 13.5 kilometers (9 miles) or as developed through a cooperative agreement to minimize contact between native wild sheep and domestic sheep and goats, depending upon local conditions and management options.

5. Domestic sheep and goats should be closely managed and carefully herded where necessary to prevent them from straying into native wild sheep areas.

6. Trailing of domestic sheep or goats near or through occupied native wild sheep ranges may be permitted when safeguards can be implemented to adequately prevent physical contact between native wild sheep and domestic sheep or goats. BLM must conduct on-site use compliance during trailing to ensure safeguards are observed.

7. Cooperative efforts should be undertaken to quickly notify the permittee and appropriate agency to remove any stray domestic sheep or goats or wild sheep in areas that would allow contact between domestic sheep or goats and native wild sheep.

8. Unless a cooperative agreement has been reached to the contrary, native wild sheep should only be reintroduced into areas where domestic sheep or goat grazing is not permitted.

9. Extraordinary precautions will be followed to protect special status subspecies, e.g., federally listed threatened, endangered, proposed and candidate subspecies, State listed subspecies and BLM sensitive subspecies."

Comment Number: #23-14

Comment: Preferred Alternative must determine the Standard Operating Procedures that affect determination of carrying capacities and allocation of forage to ungulates. Species-specific rangeland monitoring studies must be identified to deal with wild horses and pioneering elk.

Response: BLM has standard policies and regulations that it must use in determining allocation of forage. SFO monitors rangeland conditions as part of rangeland health assessments and riparian functional assessments. During these trend assessments and regular allotment visits, rangeland specialists, biologists and other staff members determine use and, if possible, where impacts are coming from and what can be done to correct any problems. The Standards for Rangeland Health require BLM to manage resources for wildlife, wild horses, and livestock and, together with other BLM-approved plans, allocate forage among users.

Comment Number: #23-31

Comment: At a point in time when an elk herd becomes established, the implementation level resource activity plan will be the state's elk sub-herd plan.

Response: The plan to be implemented will be determined by BLM in coordination with the state game agencies.

Comment Number: #23-47

Comment: Wintering habitat for mule deer are critical to sustaining big game herds throughout the planning areas.

Response: BLM concurs with comment. This information can be found in Section 3.23.4.

Comment Number: #25-20

Comment: Grazing can also adversely impact animal populations, usually due to indirect effects on habitat structure and prey availability. Bighorn sheep are highly susceptible to diseases which are spread by domestic sheep.

Response: Thank you for your comment. We agree that indirect effects of grazing can adversely affect animal populations and have addressed these impacts in Section 4.22 of this PRMP / FEIS. We have also included management actions under the preferred alternative to help control grazing and limit its impacts on wildlife, including using the biodiversity standard for wildlife habitat in land health assessments. The scientific evidence regarding the susceptibility of bighorn sheep to disease transmitted by domestic sheep is still open for debate. We will continue to monitor developments and amend our actions accordingly, in consultation and cooperation with state wildlife agencies (CDFG and NDOW), as needed in the future. The currently proposed management actions for bighorn sheep are addressed in Section 2.23.5.

24.3 Sagebrush-Obligate and Associated Wildlife

24.3.1 Sage-Grouse

Comment Number: #7-10

Comment: Protect sage-grouse habitat from fragmentation and disturbance.

Response: Protection of sage-grouse habitat is one of our major goals for wildlife under the proposed action in the PRMP / FEIS (see Goal 4 in Chapter 2.25.5). Relevant objectives include the maintenance (or creation) of core areas of critical habitat in large contiguous blocks, and ensuring their interconnectedness in a variety of irregular arrangements (such as islands, corridors, and quasi-mosaic patterns) over extended areas to allow genetic exchange between populations.

Comment Number: #19-111, #19-120

Comment: Management prescriptions do not reflect “best available science” or provide sufficient protections for sage grouse habitat. RMPs should incorporate management measures discussed in *Blueprint* (Dr. Clait Braun). Form of directive could be similar to the Alturas Field Office RMP’s Appendix K (Energy and Minerals – Surface Use and Occupancy Requirements), but must set out specific protective measures, be explicitly incorporated into appendix and be mandatory. Comment identifies some specific actions BLM should take. Specific analyses needed are identified for each RMP. Management alternatives section on sagebrush ecosystems generally discusses using conservation strategies and sets out broad goals for management. While the Draft appears to recognize importance of protection of sage grouse habitat and sagebrush ecosystems, there are not sufficient management principles or commitments to fulfill the goals.

Response: Implementation of the Conservation Strategies for Sage-Grouse and Sagebrush Ecosystems in the Buffalo-Skedaddle, Vya, and Massacre Population Management Units is a major component of our management approach for the protection of sage grouse and sagebrush ecosystems under the proposed action. Essential components of the Conservation Strategy include protection, restoration, monitoring, research, and ongoing adaptive management for sage-grouse and sagebrush ecosystems within the management unit. We agree that the Braun document is part of the updated sage-grouse science; however, we are confident that our management approach under the proposed action for sage grouse and sagebrush ecosystems will provide an effective level of protection for sage grouse and sagebrush ecosystems in the SFO planning area. See also response to Comment #30-9 below above relating to Braun's Blueprint report.

Comment Number: #19-118

Comment: Preferred alternative does not mention any restrictions at all for oil and gas development to protect sage grouse and would leave almost all the field office open for leasing with only a small percentage of that having any types of restrictions. This is a clear failure to fulfill BLM's obligations under the Sage-grouse Conservation Strategy. Only WSAs are closed to oil and gas leasing. Given area is identified as low to non-existent potential for oil and gas, leaving majority of office area open seems unnecessary.

Response: Potential for commercially viable oil and gas deposits is low throughout the management area. There are no existing oil and gas leases in the field office area, and active oil and gas exploration or production is not expected to occur in the SFO area in the future. Further interest in oil and gas leasing is not expected unless technological advances reduce the cost and financial risk of exploring beneath the volcanic overlay. However, if oil and gas development were to take place in the future, BMPs would be prescribed and implemented based upon project-specific and site-specific conditions and requirements, including those necessary to protect sensitive resources from oil and gas development. Once implemented, BMPs would be monitored, evaluated and modified as necessary through an iterative process to ensure the protection of sensitive resources, including sage-grouse habitat, and compliance with other resource management objectives.

Comment Number: #19-119

Comment: Both Ecosystem Restoration and Traditional Uses Alternative would apply seasonal restrictions within 0.25 miles of a lek, but these would apply in known habitat only and then could be supplemented as new "important habitat" is identified. The inadequacies of sage grouse protection in all alternatives for the RMP are obvious in comparison to other RMPs and those in the attached "Blueprint".

Response: Table 2.22-1 lists both seasonal and yearlong restrictions related to sage-grouse. Other guidance would come from the *Greater Sage-Grouse Conservation Plan for Nevada and Eastern California First Edition, June 30, 2004,* which pertains to the three sage-grouse Population Management Units (PMUs) located on the field office. These cooperatively developed plans list other actions related to sage-grouse such as monitoring, habitat manipulation projects, and other restrictions related to sage-grouse on the field office. These plans are available at www.ndow.org/wild/conservation/sg/plan/index.shtm, and are designed to be updated.

Comment Number: #21-1

Comment: DFG is concerned with the use of fire to manage sage grouse habitats as fire is very hard on sagebrush and can take 25 or 100 years to recover.

Response: The Preferred Alternative makes use of all available tools for habitat management. Fire is one tool that could be used and is a normal part of the ecosystem; however, the choice to use fire would be done on a site-specific basis as referenced in the Vegetation, Wildlife, and Fuels sections. Factors such as sage-brush type, size of fire, season of burn, fire history, presence of invasives, and effects to species would be considered during site-specific analysis for any such project.

Comment Number: #23-5, #23-48

Comment: Sage Grouse Conservation Planning identified fire suppression as conservation measure to protect R-O Sage Grouse Habitat. There are no references or implementation of state resource plan goals, objectives, or actions in the draft document. R-O habitat has been delineated for sage grouse in two conservation plans that require fire suppression.

Response: The discussion of full suppression in Section 2.4.5 has been revised to address the need to protect sensitive resources and wildlife habitat; revisions also include further clarification on the relationship between the NorCal Fire Management Plan and the Surprise RMP. Section 2.4.5 has been revised to state: "A full suppression AMR will be used in sage-grouse R-O habitat, as directed in the Sage-grouse Conservation Strategies for the Buffalo-Skedaddle, Vya, and Massacre Population Management Units."

Comment Number: #25-24

Comment: RMP fails to disclose possible impacts of livestock grazing on sage grouse.

Response: Chapter 4.22 has been revised to more fully address potential impacts from livestock grazing on sage-grouse.

Comment Numbers: #25-30, #25-34

Comment: There are numerous studies that show sagebrush obligates prefer living in big sagebrush canopy cover above the levels identified in the RMP DEIS. One of greatest threats to sage grouse populations is destruction and loss of habitat from a variety of management activities including livestock grazing. Literature indicates sage grouse need higher levels of sagebrush canopy cover than RMP indicates and livestock reduce that cover.

Response: Thank you for your comment. We are aware of these studies and their findings, and have included measures in our proposed action that concentrate on enhanced sagebrush-steppe ecosystem health, such as by means of juniper reduction.

Comment Number: #25-31

Comment: DEIS claims livestock grazing is major influence on sagebrush and riparian habitat and discusses how livestock grazing impacts to wildlife will be minimized. However, it does not discuss expected impacts to sagebrush communities or the species that rely on them from these management activities, nor does it provide the scale on which they will occur. Serious questions to be asked in the FEIS include: to what type of vegetation does this statement refer? Exactly how will sagebrush communities be manipulated? What are the expected impacts from treatment of these communities?

Response: The PRMP / FEIS has revised the discussions of the proposed management actions and the assessment of potential impacts to more clearly and completely present information such as that requested by this commenter, include a more thorough presentation of the results of the impact assessment on sagebrush communities from grazing. The specific activities undertaken would be determined on a site-specific basis, and would be consistent with the plans and strategies incorporated into the Preferred Alternative, including "Partners in Flight—Birds in a Sagebrush Sea, local Sage-grouse Conservation Strategies, and related strategies specifically developed for the sagebrush biome.

Comment Number: #25-35

Comment: How will agencies and management plan provide resources to address apparent conflict between healthy sage grouse and livestock grazing in some areas of SFO? How will sage grouse, leks, brood rearing cover, and other resources be affected by proposed management direction? This needs to be included in FEIS. Recommend BLM follow recommendations for managing sage grouse that are found in A Blueprint for Sage-Grouse Conservation and Recovery (full citation provided).

Response: As with all other objectives for which BLM manages, a balance will be sought between livestock grazing and sage-grouse protection, as provided for in the proposed management actions described in Chapter 2. Section 4.22 has been revised to better describe the potential impacts of grazing on sage-grouse and sagebrush habitats. See response to Comment #30-9 below regarding the Blueprint document.

Comment Number: #25-36, #30-10

Comment: FEIS should discuss whether or not proposed action complies with BLM National Sage-Grouse Habitat Conservation Strategy, USDI, November 2004. Draft RMP must also heed recommendations contained in BLM's Greater Sage-Grouse and Sagebrush Steppe Ecosystems Management Guidelines.

Response: All proposed management actions within the Proposed RMP will follow guidance as provided from BLM's *National Sage-Grouse Habitat Conservation Strategy* (2004), Conservation Strategy for Sage-Grouse (*Centrocercus urophasianus*) and Sagebrush Ecosystems within the Buffalo-Skedaddle Population Management Unit" (Northern California Sage-Grouse Working Group, 2006), and *Greater Sage-Grouse Conservation Plan for Nevada and Eastern California First Edition, June 30, 2004.*

Comment Number: #25-37

Comment: Extreme care should be exercised when planning use of prescribed fire or other vegetation treatments in sagebrush communities in planning area. The EIS should disclose areas where the future use of prescribed fire is proposed, how noxious weeds, livestock grazing, soils, vegetation, wildlife, and other resources will be affected by such management. One study recommends that sagebrush within 1.9 miles of a lek not be burned in order to protect nesting habitat. Fire on the nesting grounds is not recommended in any season if nesting habitat is limited.

Response: In general, we agree with this comment and currently do, and will continue to, exercise extreme care in planning use of prescribed fire or other vegetation treatments in sagebrush communities. Our management strategy is consistent with the protection of lek nesting habitat as identified in the *Greater Sage-Grouse Conservation Plan for Nevada and Eastern California First Edition, June 30, 2004*. Potential impacts from prescribed fire and other vegetation treatments on environmental resources in the planning area are addressed in Chapter 4 of the PRMP / FEIS.

Comment Number: #27-7

Comment: Current loss of biodiversity and threats to sagebrush obligate species like the sage grouse are the result of catastrophic disturbances from human impacts to the sagebrush steppe biome and are not the result of juniper expansion. EIS must accurately document and discuss the impacts of catastrophic historical and on-going activities which took place over last 150 years that have resulted in declining populations in sage grouse.

Response: Section 3.15.1.6 presents a summary description of shrub associations in the SFO planning area, including a brief overview of anthropogenic impacts on sagebrush steppe. However, a detailed account of the previous / historical effects of human impacts on the sagebrush biome is considered beyond the scope of this PRMP / FEIS, and can be accessed by reviewing the documents cited within the Chapter 3 discussion. Effects on sagebrush communities from the action proposed in this document are included in Section 4.22.

Comment Number: #30-9

Comment: RMPs should incorporate management measures discussed in *A Blueprint for Sage Grouse Conservation and Recovery* (Dr. Clait Braun). BLM should adopt new and stricter management prescriptions for livestock grazing.

Response: We appreciate the opportunity to review and consider additional guidelines in the development of management actions for sagebrush ecosystems and sage-grouse populations in the SFO planning area; we agree it is part of the updated standards and guidelines science. BLM staff make every effort to stay current with the various management strategies and prescriptions being implemented today, especially the more successful ones. We will consider adopting in the future some of the actions identified in the Blueprint that are appropriate for the SFO planning area. However, because we already have a Conservation Strategy for Sage-Grouse that is specific to our planning area, and therefore directly applicable to the existing sage-grouse population and sagebrush ecosystem conditions and concerns facing us, we are adopting guidelines from BLM's own Conservation Strategy for Sage-Grouse as our management protection measures under the proposed action (see Section 2.22 of the Proposed RMP Final EIS). We will continue to consider additional guidance, as appropriate and available, as we implement measures to bring us closer to full restoration, protection, and enhancement of this important species and its habitat.

Comment Number: #34-13

Comment: Under Sagebrush Obligate Species section the second bullet should also include "Washoe-Modoc Sage Grouse Conservation Strategy" (page 2-145)

Response: Documents such as the one cited by the commenter are included in the category of "locally developed conservation strategies or plans" in the bullet immediately preceding the one referenced in the comment.

Comment Number: #35-26

Comment: Instead of having one generic bullet that refers to "local, state, and national guidelines for managing sage-grouse and their habitats," include specific plans/guidelines for managing sage-grouse and their habitat (2-108).

Response: Proposed management actions for managing sage-grouse and their habitat are described throughout the PRMP / FEIS, and specifically in Chapters 2.8 Livestock Grazing, 2.17 Vegetation, and 2.22 Wildlife and Fisheries. Specific guidelines to be implemented are also outlined in the "Conservation Strategy for Sage-Grouse (*Centrocercus urophasianus*) and Sagebrush Ecosystems within the Buffalo-Skedaddle Population Management Unit" (Northern California Sage-Grouse Working Group, 2006), BLM's National *Sage-Grouse Habitat Conservation Strategy* (2004), and the *Greater Sage-Grouse Conservation Plan for Nevada and Eastern California First Edition, June 30, 2004.*

Comment Number: #35-45

Comment: Page 3-109, Greater Sage-Grouse. There is no discussion of the population management unit plans (PMU) for the Vya or Massacre PMUs in this section. Suggest BLM add in appropriate discussion of these two PMU plans including major components and outcomes from these plans. Are they complete? If so, it should be stated in this section.

Response: Section 2.22.6 has been revised to reflect management of sage-grouse according to the "Conservation Strategy for Sage-Grouse (*Centrocercus urophasianus*) and Sagebrush Ecosystems within the Buffalo-Skedaddle Population Management Unit" (Northern California Sage-Grouse Working Group, 2006), BLM's National *Sage-Grouse Habitat Conservation Strategy* (2004), and the *Greater Sage-Grouse Conservation Plan for Nevada and Eastern California First Edition, June 30, 2004.*

24.3.2 Burrowing Owl

Comment Number: #35-30

Comment: Reference in header on page 2-111 that burrowing owls are addressed in sagebrush-obligate wildlife section. While including it in this discussion is understandable, it is not a sagebrush-obligate species and this distinction should be made.

Response: The title of the subsection referenced in this sentence has been revised to "Sagebrush-Obligate and Associated Species." The reference to this subsection in the sentence cited by the commenter has been revised accordingly.

24.3.3 Pygmy Rabbit

Comment Number: #35-32

Comment: Pygmy rabbit habitat needs are not necessarily the same as those for sage grouse thus management for the two species is not likely to be the same in many cases. Document should recognize this and sufficient flexibility be built in to allow for different management needs. (page 2-197)

Response: The section and page numbering for this comment in the letter received indicate that the commenter was referring to text in the Eagle Lake Draft RMP EIS instead of the SFO document. The objectives in the SFO document do not imply that habitat needs are the same for all species, and the proposed management actions include use of species-specific plans.

Comment Number: #35-40

Comment: Pygmy rabbit (3-104) Request insertion of new sentence after first sentence under header regarding 2005 FWS finding.

Response: The requested sentence has been incorporated into Section 3.23.2 of the PRMP / FEIS.

Comment Number: #35-41

Comment: Recommend that first two sentences (top of page 3-105 in second paragraph) be dropped – starting with "Over the past several decades…." And continuing through to "agricultural and managed grasslands."

Response: The document has been revised as requested.

24.4 Other Native Wildlife Species

Comment Number: #18-16, #25-21

Comment: Studies show negative effect of grazing on abundances of neotropical migratory landbird species (1993 study cited), but impacts to these species are lacking in DEIS.

Response: BLM acknowledges that livestock grazing may affect habitats of various birds depending on grazing management. Although grazing intensity has been reduced over the entire field office since the 1960's (see to Section 3.9 Livestock Grazing), there appears to have been plant community changes prior to this. The exact effect of these changes is unknown and not enough information exits to say how much habitat may have been either permanently or temporarily changed. Several recent bird surveys were conducted on the SFO prior to this plan by the Point Reyes Birds Observatory and the Great Basin Bird Observatory however, they were not looking at effects of grazing to birds. BLM has recently adopted several plans written in cooperation with Partners in Flight for riparian, sagebrush, and pinyon-juniper habitats and these plans will be used to further refine grazing strategies on the Surprise Field Office.

Comment Number: #20-7

Comment: RMP does not adequately address migration corridor locations or protective measures. Need extensive coordination and information sharing among four area offices (including Carson City, CA Dept of Fish and Game, and the Nevada Dept of Wildlife) regarding migration and corridor protection that should be included in RMPs.

Response: BLM has been in contact with CDFG to request updated maps on migration corridors (although none have been provided to date). BLM has consulted, coordinated, and/or collaborated with a number of Federal (including BLM's Carson City Field Office), State, and county/local agencies in the ongoing management of lands in the SFO and in development of the Proposed RMP, as discussed in general terms (in Chapters 1 and 5 of the PRMP / FEIS) and in more specific terms in various resource sections throughout the document. We recognize that further consultation and coordination – through formal (agreements, MOUs) and informal arrangements – will be required in many instances to successfully implement specific management actions proposed/identified in the PRMP / FEIS. We will continue to coordinate with the appropriate agencies / entities in this regard. This includes continued consultation with Native American Tribes to identify areas in need of special management or protection and continued implementation of agreements to protect tribal special interest areas from adverse impacts; forming partnerships with local communities and interest groups to market the heritage tourism opportunities of the field office area's historic trails; and continued coordination with State wildlife agencies in conducting environmental reviews and possible implementation of site-specific projects with potential wildlife impacts.

Comment Number: #23-33

Comment: Sharptail grouse have potentials for reestablishment.

Response: The management of sharp-tailed grouse is addressed as part of Goal # 5, Other Native Wildlife. Sharp-tailed grouse management would be initially managed via BLM Manual 1745, "Introduction, Transplantation, Augmentation, and Reestablishment of Fish, Wildlife, and Plants."

Comment Number: #25-29

Comment: Need a discussion of the effect grazing has had on predators. The most vehement opposition to wolves, bears, and other predators comes from the livestock industry, and is one of the main reasons some of the species are now listed.

Response: A detailed account of the previous / historical indirect effects of livestock grazing on the population of natural predators is considered beyond the scope of this PRMP / FEIS; however, effects of grazing on all wildlife species from the action proposed in this document are included in Section 4.22.

Comment Number: #27-8

Comment: Table 3.19-3 lists 21 terrestrial wildlife species of special concern, and all but four are dependent upon juniper woodlands. It is inconceivable that DEIS fails to accurately assess the impacts to juniper-dependent or associated wildlife from the proposed juniper eradication activities. EIS must disclose impacts of project on the viability of other wildlife species associated with juniper woodlands (letter lists 28 bird and mammal species).

Response: BLM's proposed management actions regarding juniper removal consist of removing juniper from sites where it is encroaching on other vegetation communities, such as sagebrush steppe, and do not include removing historic juniper woodlands, which do provide habitat important to wildlife.

Comment Number: #27-9

Comment: Importance of older, mature, or old-growth juniper to cavity nesting birds and as reliable sources of berries for neotropical migratory birds and other wildlife must be discussed and protective measures must be included to avoid impact to natural stands of older juniper, which can still have small diameter trunks. Tree diameter limits must be included in the EIS.

Response: We intend to protect old growth stands and would design vegetation treatments to maintain and ehance old-growth stands based on local habitats. Under the proposed action, we would manage for protection of old growth juniper stands. Native or true juniper woodlands are characteristic of several soil types found in the SFO planing area. Western juniper would be preserved on these sites and managed for major stages of woodland development.

In addition, small amounts of juniper would be retained in sagebrush-steppe areas where juniper has encorached to preserve biodiversity and wildlife habitat. Section 2.6.5 has been revised to state: "All fuels management projects would be designed in accordance with wildlife habitat objectives. Caution would be taken to not introduce fire into already degraded communities dominated by annual grasses. Fuels projects would not be undertaken in low sagebrush communities, particularly in known sage-grouse or pygmy rabbit habitats, unless needed to meet specific habitat objectives. Fuels projects would be coordinated with state game agencies regarding important wildlife habitats." Regarding designation of an old growth juniper, see response to comment #30-20 in ACECs subsection of this appendix.

Regarding tree diameter, there are other factors to consider besides tree diameter, and these factors vary depending on specific needs of a given area. Therefore, BLM prefers to maintain flexibility in the RMP to consider all the relevant issues.

Comment Numbers: #35-25, #35-46

Comment: Need to update citation to Nevada Bat Conservation Plan (2006 version now available) (p. 2-189 and Ch. 3). Pages 3-110 and 3-111, various bat species descriptions. Need to update reference to Nevada Bat Conservation Plan that was recently finalized and released as a revised plan in 2006.

Response: This section has been revised to accurately cite the source for the information presented.

Comment Numbers: #35-31, #35-47

Comment: Recommend BLM actively manage for native fish only (page 2-116). Page 3-114, 3.19.6. Recommend BLM manage for native fish species where there is a conflict between native and non-native species.

Response: Although BLM policy is not to promote non-native species over natives, we also have the responsibility to provide as allowable other uses such as hunting, fishing, and sightseeing, which locally benefit from the presence of non-native species. The recommendation to manage for native fish where non-native fish are negatively impacting them is stated in several sections of Section 2.23.8 of the DEIS and is part of the Preferred Alternative. This issue has been added to the end of section 3.23.9, "Invasive Species" to emphasize this issue in the field office area.

Comment Number: #35-37

Comment: Wildlife discussion (page 3-109 to 3-119) is focused on listed species, special status species, and big game species. Consider adding additional discussions of other wildlife and fish species not discussed in the Draft. Discussion of full range of wildlife found in SFO is suggested even if coverage is brief; wildlife groups could be discussed such as waterfowl, migratory birds, reptiles, amphibians.

Response: Information on other wildlife and fish species is found in the appropriate habitat discussions (the habitats in which they would be found).

Comment Number: #35-50

Comment: Document also lacks predicted outcomes for species, species groups, or guilds. Nothing is presented to indicate if BLM thinks implementing Preferred Alternative, as presented, will cause wildlife and fish populations to increase, decrease, or stay the same over lifespan of the RMP/EIS. At minimum, this should be done for federally listed species and perhaps BLM special status species as these are among the wildlife populations at greatest risk.

Response: Chapter 4 has been revised to provide a more thorough and clearer evaluation of impacts on fish and wildlife resources from proposed management actions identified under the various program areas (such as grazing, mining, transportation, and OHV use). In addition, because the majority of management actions emphasize protection of species habitat as a means of addressing population concerns/improving existing population levels – including protected or special status species – the discussion of results likewise focuses on impacts relative to habitat conditions. However, it can generally be inferred that improved habitat conditions would lead to increased population, as levels rise to the biological potential of their habitat.

24.5 General

Comment Number: #7-8

Comment: Fully protect all rare, federally, and state listed T&E species.

Response: Protection of listed T&E species is one of our major goals for fish and wildlife under the proposed action in the PRMP / FEIS; see Chapter 2.22.1.

Comment Number: #9-1

Comment: Support for Preferred Alternative with respect to management of wildlife and fisheries.

Response: Thank you for your support.

Comment Number: #14-30

Comment: Brief review and comparison of the fire management, fuels, vegetation, wildlife and cultural resources alternatives indicates that the RMP lacks the coordination required in items 3 and 7 listed in Appendix C of the Planning Handbook H-1601-1: (3) Identify allowable uses and management actions to achieve goals and objectives, and support the goals and objectives for vegetation, wildlife and other resources. (7) Identification of restrictions on fire management practices needed to protect resources.

Response: The discussion in Section 2.4.5 has been revised to address the need to protect sensitive resources and wildlife habitat from fire and fuels management actions. We believe that the identified allowable uses and proposed management actions listed within Chapter 2 for cultural resources, fire, fuels, vegetation, and wildlife are adequate to meet desired future conditions, goals, and objectives, as listed in the PRMP.

Comment Number: #17-13

Comment: Timing and spatial stipulations for sensitive biological resources should be regarded as guidelines only and not as definitive dates and distances; site and project specific information must be taken into account. Conditions for controlling surface-disturbing and disruptive activities should be taken as guidelines, not mandates.

Response: Timing and spatial stipulations for special status species are generally regarded as guidelines however in most cases will remain very close to the guidelines, especially where they follow conservation strategies, biological opinions, or other mutually agreed upon plans.

Comment Number: #23-1

Comment: In general, preferred alternative presents the Wildlife and Fisheries Program as a mitigation response to a variety of management actions of 21 other programs goals and objectives. Management actions necessary to fully address the impacts to fish and wildlife resources are mixed throughout the document – uses examples of NorCal Fire Management Plan. Management actions implementing this series of decisions area found in various sections of document yet the NorCal Fire Management Plan it not found within the text or Appendix. This plan serves as an amendment to the previous MFP III Decisions without the benefit of NEPA. Agency has no record of this major federal action impacting the majority of resource programs of past and pending land use plan decisions.

Response: The Preferred Alternative for Section 2.22 has been modified to more clearly state proposed management actions for wildlife and fisheries. In addition, the discussion of full suppression in Section 2.4.5 has been revised to address the need to protect sensitive resources and wildlife habitat; revisions also include further clarification on the relationship between the NorCal Fire Management Plan and the Surprise RMP. Section 2.4.5 has been revised to state: "A full suppression AMR will be used in sage-grouse R-O habitat, as directed in the Sage-grouse Conservation Strategies for the Buffalo-Skeddaddle, Vya, and Massacre Population Management Units."

Comment Number: #23-2

Comment: In light of other land use plan amendments, the implementation of the 1999 Standards and Guidelines for Livestock Grazing Management is unclear and not consistent in the draft documents. Guidelines are the site-specific management actions to achieve standards and desired plant conditions, but are intermittently mentioned and not fully assessed in the context of mitigation for wildlife habitat. Without proper expression of objectives and management actions, the RMP alternatives are inadequate for meeting general wildlife goals or objectives.

Response: The Preferred Alternative for Section 2.22 has been modified to more clearly state proposed management actions for wildlife and fisheries. Section 2.22.1 states "The implementation of BLM land health standards (from the Northeastern California and Northwestern Nevada Standards for Rangeland Health and Guidelines for Livestock Grazing Management) require restoration (or significant progress toward restoration) for all rangeland—including habitats of federally listed, proposed, and other special status species. Additional language has been added to Section 4.22 of the Proposed RMP addressing effects of livestock grazing on wildlife.

Comment Numbers: #23-3, #23-28

Comment: Several important Nevada resource management planning documents were not included in the text and none of the plans were expressed in other sections for proper assessment or implementation (e.g., Nevada's Comprehensive Wildlife Conservation Strategy, Mule Deer Species Plan, Partners in Flight, Elk Species Plan, Sage Grouse Conservation Plans, and others). Implementation of these plans will require proactive management goals, objectives, and actions.

Response: Several of the mentioned plans were not available at the time the Draft RMP went to printing, however, several of these have been added to the reference list in Section 2.22.1. While all relevant plans may not be listed in the final EIS, BLM will still be using state and other partner plans to help guide wildlife management on the Surprise Field Office.

Comment Number: #23-9

Comment: Desired Plant Communities should be included in wildlife section. In the Vegetation section, desired plant communities need to be defined by the five general plant communities and, in the wildlife section, desired future condition needs to be identified by the five plant communities and tiered to specific species of state resource plans. Desired plant communities and conditions for key wildlife habitats are identified on page 6 of comment letter.

Response: BLM agrees that Desired Plant Communities are important and are included under the Vegetation subheading along with the Desired Future Condition (DFC) for the five general associations. Section 2.15.5 of the Proposed RMP outlines proposed management actions for vegetation with specific management outlined for sagebrush, aspen, bitterbrush, and other important wildlife habitats. During site-specific project planning, BLM conducts analysis to determine affects to species and the plant communities they depend on and modifies projects based on the site, e.g., water availability, soil types, risk of invasion by non-natives. A DFC for wildlife is dependent on plant communities that exist or can exist on a site and the wildlife being managed for on the site. The DFCs outlined in the comment letter will be used in conjunction with other information such as habitat plans in developing site-specific DFCs for wildlife habitat on the SFO**.**

Comment Numbers: #23-16, #35-54

Comment: Nevada BLM develops best management practices to mitigate and protect wildlife habitat. Could not find the BMPs in the text or appendix. Narratives for water quality suggest that BMPs will be developed and are not known. Recommend BLM develop and include an Appendix that summarizes by program the best management practices or conservation measures BLM intends to apply to wildlife and fish species to minimize the effects of all development actions that will be allowed under Preferred Alternative. Summarizing this info in one place would allow reviewers better understanding of how actions can be implemented while also minimizing associated impacts of development.

Response: Some BMPs for wildlife have been developed by the Nevada BLM. BMPs are generally developed and implemented on a site-specific basis. Those developed by the Nevada BLM will be examined and if needed modified for use by this field office. Additional BMPs or mitigation measures will be developed and implemented as needed. Water-related BMPs will be used as developed by BLM Water Quality specialists to manage riparian and instream related habitat management.

Comment Number: #23-29

Comment: Management actions need to be included that identify numbers of acres of habitat restoration accomplished per year.

Response: The Draft and Proposed RMPs outline the target range of habitat restoration per year to be accomplished by each program area. All vegetation restoration projects would be coordinated between BLM resource specialists, and designed and implemented within wildlife habitat guidelines. There is yearlong coordination between programs to meet all vegetation and habitat annual goals. These targets are reviewed several times each year both internally at the field office level but also externally by state and Washington office level reviews.

Comment Number: #23-30

Comment: Water developments for wildlife need to be included and justified.

Response: Specific water developments have not yet been designated and would not be at this level of planning. The RMP does state that water developments could be used as appropriate.

Comment Number: #23-32

Comment: Fire rehabilitation plans must include recovery objectives for vegetation. The two year rest policy does not specifically rely on actual recovery criteria of the burn. This issue needs better clarification throughout the text.

Response: A new Section (2.4.6) has been added to the Proposed RMP on Fire Rehabilitation, which includes text regarding recovery objectives for vegetation. "Emergency fire stabilization and rehabilitation activities would be implemented on a case-by-case basis following wildland fire in consultation with affected tribes and other interested parties. A unique and specific environmental analysis would be completed for each emergency fire stabilization and rehabilitation project. Each plan would include monitoring and assessment for adaptive management decisions."

Comment Number: #23-34

Comment: Objectives for wildlife habitats must include a complete description of desired future condition with specific management actions to achieve them. These measures will be tiered to the present Standards and Guidelines.

Response: BLM agrees that Desired Plant Communities are important and are included under the Vegetation subheading along with the Desired Future Condition (DFC) for the five general associations. Section 2.15.5 of the Proposed RMP outlines proposed management actions for vegetation with specific management outlined for sagebrush, aspen, bitterbrush, and other important wildlife habitats. During site-specific project planning, BLM conducts analysis to determine affects to species and the plant communities they depend on and modifies projects based on the site, e.g., water availability, soil types, risk of invasion by non-natives. A DFC for wildlife is dependent on plant communities that exist or can exist on a site and the wildlife being managed for on the site. The DFCs outlined in the comment letter will be used in conjunction with other information such as habitat plans in developing site-specific DFCs for wildlife habitat on the SFO**.**

Comment Number: #23-35

Comment: Wildlife and fisheries management actions common to all alternatives must include the Standard Operating Procedures that will implement the wildlife objectives. These planning features might include multiple use decisions scheduled for every three years.

Response: Standard Operating Procedures (SOPs) are an integral part of the RMP, found within various guiding documents such as BLM manuals, conservations strategies, and other collaborative efforts e.g., sage-grouse, sagebrush and riparian conservation plans**.**

Comment Number: #23-36

Comment: General aquatic wildlife survey is the mutual protocol for stream survey. This federal survey provides five habitat factors for objectives in land use planning. Data collected by our agency provides the necessary data for assessment and management. Suggest that these factors be introduced into the text with management actions to meet them.

Response: BLM is not familiar with the "general aquatic wildlife survey". BLM completes stream surveys according to BLM's Riparian-Wetland Initiative for the 1990s (U.S. Department of the Interior 1991) which establishes national goals and objectives for managing riparian-wetland resources on public lands. The initiative's chief goals are to: (1) restore and maintain riparian-wetland areas so that 75% or more are in properly functioning condition (PFC) by 1997; and (2) achieve an advanced ecological status, except where resource management objectives (e.g., Desired Plant Community) require that an earlier successional stage be present to provide the most habitat diversity for wildlife, fish, and watershed protection. The Surprise Field Office completed Riparian Functional Assessments (RFAs) using Water Source Inventory data in 1993 and actual on-the-ground assessment from 1995 to 2002. The RFA team consisted of BLM Wildlife Biologist, Rangeland Management Specialist, Watershed Specialist and seasonal Archeological Technician and Biological Technician. In addition, BLM uses applicable water quality indicators as found in BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing Management on BLM-Administered Lands in Northeastern California and Northwestern Nevada (S&Gs). Primary indicators are water temperature, nutrient levels, coliform count (fecal bacteria), turbidity, sediment load, dissolved oxygen (DO), and stream channel condition. (These are discussed in Section 4.20 of this Proposed RMP.)

Comment Number: #23-49

Comment: Failure to establish the desired outcome, set goals, objectives, and management actions in the RMP, the ROD will not carry the necessary measures to properly protect and enhance wildlife resources.

Response: The Preferred Alternative for Section 2.22 has been modified to more clearly state proposed management actions for wildlife and fisheries. We believe our goals, objectives, and proposed management actions for wildlife and fisheries contain adequate measures to protect and enhance wildlife habitat within the SFO.

Comment Number: #25-16

Comment: BLM must show that benefits of domestic livestock grazing out-weigh the costs to comply with Multiple Use Sustained Yield Act (MUSYA). DEIS fails to disclose any of the direct, indirect, or cumulative impacts associated with domestic livestock grazing from proposed management direction under any of analyzed alternatives. DEIS analysis of impacts is less than 1/2 page on page 4-77.

Response: MUSYA does not apply to BLM; therefore, BLM is not required to include such a discussion in the RMP. Chapter 4 has been revised to include an improved discussion of direct, indirect, and cumulative impacts associated with domestic livestock grazing. In both the Draft EIS and this Final EIS, please note that impacts <u>from</u> livestock grazing are addressed in Chapter 4 under each of the various resource areas that could be impacted by grazing (for example, vegetation or wildlife). The section referenced by the commenter presents the evaluation of impacts <u>on</u> livestock grazing from the proposed management actions. See Chapter 4 of PRMP / FEIS.

Comment Number: #25-18

Comment: The DEIS fails to disclose how habitat conditions, and thus wildlife populations, have changed due to conversion of native vegetation to crested wheatgrass or other non-native species. How has such conversion influenced habitat? What are the impacts?

Response: Chapter 4 references impacts of crested wheatgrass on wildlife and specifically references certain species groups such as wild ungulates and sage-steppe birds; see Section 4.22. The discussion of Incomplete or Unavailable Information in Section 4.22 also states that trend information does not exist locally for most species but that adequate information does exist to predict consequences of management actions.

Crested wheatgrass was planted in previous decades (on about 3% of the SFO) after fires and as a method to feed livestock on lower elevation ranges. Areas planted were predominantly in pronghorn antelope winter and yearlong habitats although greater sage-grouse, various sage-steppe birds, and pygmy rabbit likely were also found in these areas. The exact adverse affects of these plantings on wildlife are not known beyond the obvious loss of forage and cover for various native species. Section 2.15.5 states "Crested wheatgrass communities will be maintained where in a healthy and productive condition (36,740 acres); however, crested wheatgrass stands in poor condition (8,400 acres) will be restored to native vegetation." The overall adverse impacts to wildlife would be negligible due to the small percentage of BLM administered lands that would remain as crested wheatgrass seedings.

Comment Number: #25-22

Comment: DEIS does not indicate a reason for decline of bighorn sheep, sage grouse, and other species populations in planning area.

Response: The reason for the decline of bighorn sheep is a complex matter, beginning with human encroachment and settlements. We appreciate your comment; however, we consider such a discussion to be beyond the scope of this document and no changes have been made to document in response to this comment.

Populations of greater sage-grouse within the SFO have not necessarily declined in recent years. Although weather has sometimes drastically affected annual sage-grouse survey efforts, as recently as 2006, field work showed that the Surprise Field Office has approximately 50 active leks. Because most areas of the field office are only now being regularly surveyed, it is difficult to ascertain any loss or gains in historic lek numbers with great certainty. Recent surveys, however, indicate that the number of leks appears to be stable, although bird attendance varies annually. Survey efforts between the mid 1990s and the present in the Surprise Field Office area have found active historical leks and several previously unknown active leks. The population of sage-grouse (about 500) in the Warner Lake watershed is one of the largest in northeastern California.

Comment Number: #25-25

Comment: Omissions (failure to state reason for species decline, failure to take action to eliminate domestic sheep in areas used by bighorn, and failure to disclose impacts of grazing on sage-grouse) result in failure to meet standard for maintaining viable and diverse populations of wildlife and violates NEPA's requirements to address potential cumulative impacts.

Response: As stated in response to Comment #25-22, a detailed discussion of the reasons for decline of bighorn sheep is beyond the scope of this document. Regarding elimination of domestic sheep in areas used by bighorn sheep, BLM will follow BLM's "Guidelines for Managing Domestic Sheep and Goats in Wild Sheep Habitats" (BLM 1998). These are outlined in Comment Response 19-110.

As stated in response to Comment #25-22, populations of greater sage-grouse within the SFO have not necessarily declined in recent years. Chapter 4.22 has been revised to more fully address potential impacts from livestock grazing on sage-grouse.

Comment Number: #29-7

Comment: RMP does not adequately address migration corridor locations or protective measures. Need extensive coordination and information sharing among four area offices (including Carson City), CA Dept of Fish and Game, and the Nevada Dept of Wildlife regarding migration and corridor protection that should be included in RMPs.

Response: Coordination takes place as part of meetings and information exchanges and requests. This coordination is part of the MOUs and other documents outlined in the Bibliography of the Proposed RMP. Although not shown within the EIS, the SFO did request updated wildlife use maps from both the CDFG and NDOW and used any new information received during development of the EIS. We recognize that further consultation and coordination – through formal (agreements, MOUs) and informal arrangements – will be required in many instances to successfully implement specific management actions proposed/identified in the PRMP / FEIS. We will continue to coordinate with the appropriate agencies / entities in this regard.

Comment Number: #34-11

Comment: Text reads that locally developed conservation strategies for sage-grouse, pygmy rabbit, burrowing owl, and other special status species would be used to identify fire suppression areas. Recommend also adding: "land tenure decisions, off-highway vehicle regulations and utility corridor decisions" (2.23.6.4, page 2-113).

Response: Section 2.22.6.4 of the Proposed RMP has been revised to state: "Use locally developed plans or conservation strategies to identify and manage high-priority treatment areas (including fire suppression areas, utilities and rights-of-way, land tenure decisions) for sage-grouse, pygmy rabbit, and other sagebrush-obligate special status species".

Comment Number: #35-4, #35-5

Comment: RMP needs to reference Nevada Comprehensive Wildlife Conservation Strategy (CWCS) and agree to support it at some level. Recommend BLM document the level of support that will be provided towards implementation of the CWCS and include this in RMP EIS. RMP needs to reference California CWCS and agree to support it at some level. Recommend BLM document the level of support that will be provided towards implementation of the CWCSs and include this in RMP EIS.

Response: The Nevada and California Comprehensive Wildlife Conservation Strategies were published after the printing of the Draft RMP. These documents have been added to Section 2.22.1 of the Proposed RMP. As is their intention, the Comprehensive Wildlife Conservation Strategies will be used along with other similar plans to help identify species and habitats most in need of conservation efforts within the Surprise Field Office.

Comment Number: #35-23

Comment: Clarify what MOU is being referenced on page 2-108 in the first bulleted item in the list.

Response: The referenced MOU is Memorandum of Understanding (MOU) between USDA-Forest Service, USDI-Fish and Wildlife Service, USDI-Bureau of Land Management, USDI-National Park Service, and USDC-National Marine Fisheries Service (MOU 94-SMU-058, 1994). This MOU provides a general framework for cooperation and participation among the cooperators in the conservation of species that are tending toward federal listing. Text has been clarified in Section 2.22.1.

Comment Number: #35-24

Comment: Suggest adding eight conservation plans (listed in comment) to the list on p. 2-108.

Response: Additional conservation plans have been added to Section 2.22.1, as appropriate.

Comment Number: #35-33

Comment: Add provision to preferred alternative that, subject to funding and staffing constraints, BLM will promote watchable wildlife opportunities and develop interpretive guides/programs/sites for SFO land base (page 2-119)/

Response: We believe the proposed management actions for Section 2.22.7.4 Native Wildlife, are adequate as written.

Comment Number: #35-49

Comment: Chapter 4, page 4-226 to 4-246. Impact discussion is very general. Little data presented to support conclusions even when conclusions seem reasonable. Should consider incorporating additional existing supporting documentation into RMP EIS. Identifies potential data sources.

Response: The discussion of potential impacts to wildlife has been substantially revised in the PRMP / FEIS.

Comment Number: #35-51

Comment: BLM should also reconsider manner in which RMP/EIS currently presents outcomes for all various programs, such as livestock grazing, mining, transportation, etc. As currently organized, expected outcomes for wildlife and fisheries are not presented distinctly by program area.

Response: The discussion of potential impacts to wildlife has been substantially revised in the PRMP / FEIS, including a change to the organization of the information presented.

Comment Number: #35-52

Comment: Discussion of effects on wildlife and fisheries seems somewhat biased towards positive effects resulting from restoration and vegetation management activities versus negative impacts that could result from grazing, oil and gas development, mining, and OHV use.

Response: The discussion of potential impacts to wildlife has been substantially revised in the PRMP / FEIS, including more thorough documentation of the assessment of potential adverse impacts from the cited activities.

Comment Number: #35-53

Comment: Document does not present complete analysis of worst case scenario for wildlife and fisheries populations given preferred alternative and what it presently allows (e.g., cumulative effects). What if worst case scenario - heavy development in several areas all in same approximate time frame? Or best case scenario? Need discussion of combined effects of all the possible actions BLM may undertake or authorize over lifespan of RMP on biological resources.

Response: BLM does not evaluate the "worst-case" scenario in its NEPA documents. It is no longer required, consistent with the Council on Environmental Quality's regulations for implementing NEPA at 40 CFR 1500-1508. Cumulative effects on wildlife are addressed in Chapter 4.22.

25.0 PUBLIC INVOLVEMENT / COORDINATION WITH OTHER AGENCIES

This section is divided into the following subsections:

25.1 – Public Involvement
25.2 – Coordination with Other Agencies

25.1 Public Involvement

Comment Number: #1-1

Comment: Concerns listed under Issue 8 are also concerns for all archaeological sites, not just traditional cultural properties

Response: The referenced text in Chapter 1 is a statement of the issues as they were raised during scoping. Issue 8 has been revised in order to be more comprehensive, to read "How should public lands be managed to sustain cultural resources and traditional cultural properties of Native American cultures?" Please note that the alternatives and analysis do address these concerns for all archaeological sites.

Comment Number: #1-2

Comment: Wants to know whether or not Nevada-based groups were asked to provide input on sites they would like to see designated as ACECs (e.g., archaeological organizations and advocate groups such as the Nevada Rock Art Foundation).

Response: No specific request was made to these groups. However, each group had the same opportunity to comment on the Draft RMP during the three-month public comment period as the rest of the general public. Important cultural resource rock art sites are included in the proposed ACECs and CRMAs. These groups have been included on the BLM RMP mailing list.

Comment Number: #3-4

Comment: Offers direct support to BLM in area of wilderness restoration.

Response: BLM welcomes all support in implementing its proposed management actions under the PRMP / FEIS and is happy to discuss opportunities for improved coordination or consultation needs with all interested or potentially affected parties. Please contact the SFO directly to arrange a meeting or to talk with specific staff members about a given area of support, interest, or need.

Comment Number: #12-11 (and others not specifically identified)

Comment: Please keep Friends of the River on mailing list.

Response: All commenters on the Draft EIS have been added to the mailing list.

Comment Number: #14-4

Comment: Section 1.4 is full of items that are not real concerns and should be carefully reviewed to make sure they are concerns. Gives examples of which are not real concerns.

Response: The referenced text in Chapter 1 is a statement of the issues as they were raised during scoping.

Comment Number: #14-6

Comment: Regarding Issue 6, there is no indication of the negative role of wildland fire in the great basin ecosystem consistent with concern raised in Section 1.2 related to increased cheatgrass and decline of sage-grouse.

Response: These paragraphs in Chapter 1 are brief statements of issues raised during the scoping process. Proposed management actions responding to these issues, a description of the affected environment, and the potential environmental consequences of the proposed management actions are presented in Chapters 2, 3, and 4, respectively.

Comment Number: #16-6

Comment: Request the right to supplement these comments and receive notice of any future developments and would also request a meeting with BLM to resolve these concerns.

Response: We believe that the 90-day public comment period allowed a sufficient amount of time for review of this material. The requested meeting occurred and the issues discussed are addressed throughout the PRMP / FEIS.

Comment Number: #17-3

Comment: Recommends that BLM take active steps to work with stakeholders at federal, state, and local level to expand the concept of federal Energy Corridors to state-wide utility corridors that include state and local government lands. In addition to addressing existing energy needs, the establishment of state-wide utility corridors must take into consideration reasonable foreseeable development.

Response: We will work with the appropriate agencies in the development of new energy / utility corridors as they are identified. BLM will complete the necessary site-specific environmental reviews necessary to identify and evaluate proposed routes, such as for the east-west corridor transmission route. See also responses to comments regarding Transmission / Energy Corridors in this comment-response appendix.

Comment Number: #24-9

Comment: CRMP development should include the grazing permittees.

Response: CRMP plans will not directly affect grazing permittees. Projects would be coordinated with interested publics at a site-specific level. The management plan (CRMP) that will be created for the CRMAs will address items such as research opportunities, public interpretation, archaeological inventories, law enforcement patrols to curb vandalism, public education and interpretation, site monitoring, and the development of site stewardship programs. The plans will address archaeological sites located only on public lands. Decisions regarding livestock grazing will not be a part of these plans. Any projects resulting from plan decisions that have the potential to impact any resources will be addressed through proper NEPA documentation and consultation with potentially affected parties.

Comment Number: #25-2

Comment: Insufficient time to review extensive errata sheet released in June 2006. Request that BLM re-issue the DEIS, including errata sheet, to give public adequate opportunity to review data in errata sheet and effects associated with changes

Response: We realize that review of the errata sheet required some additional effort from reviewers. However, we believe that the 90-day public comment period, which did not close until July 27, 2006, allowed a sufficient amount of time for review of this material.

Comment Number: #26-2, #26-43

Comment: Apparent intent of Congress regarding the terms “consult, cooperate, and coordinate” was meant to be between agencies and permittees, but in this document these terms appear to have been directed to most other areas and are lacking when dealing with permittees. Should be coordinating more with the permittees since livestock is the main focus and event of BLM (outgrowth of Taylor Grazing Act). But BLM planners seem to have lost sight of this fact. Commenter notes that there are 3 livestock operators on the Northeast California RAC (20% of the RAC) which does not necessarily represent the livestock permittees. In review of table 5.1-1, commenter will note no coordination with permittees or allotment associations, which have legal standing.

Response: BLM believes that we have appropriately included permittees in this RMP / NEPA process consistent with our inclusion of other interested parties, including making opportunities available for input during the scoping process, documentation and consideration of issues raised in scoping, providing notice of public meetings, making the draft document available for review, and responding to comments in this Final EIS. Although the origins of one of the two agencies that were merged in 1946 to form BLM (the U.S. Grazing Service) was focused on grazing, the current functions of BLM are assigned in the 1976 FLPMA, and clearly describe our current multiple-use, sustained yield management mandate. As stated in Section 5.2, the RAC is a committee chartered separate from this NEPA process, whose members act as an advisory council representing diverse and often competing interests; the composition of the RAC is outside of the scope of this EIS. In addition, permittees (and other interested parties) are welcome to contact BLM at any time regarding any site- or project-specific concerns that are more appropriately discussed outside of the realm of this programmatic-level RMP.

Comment Number: #26-44

Comment: Request an extension of time to comment and wish to make oral comments on those sections not commented on yet.

Response: We believe that the 90-day public comment period allowed a sufficient amount of time for review of this material.

25.2 Coordination with Other Agencies

Comment Number: #1-4

Comment: Because of SHPO protocol, include a reference in the text to coordinating on public education for Archaeological Awareness Week/Historic Preservation Month.

Response: Reference to public education has been added to Section 2.2.5.

Comment Number: #1-6

Comment: Regarding maintenance of current cultural resource inventory data in GIS format, SHPO suggests including a recommendation to share the data with CA and NV SHPOs in keeping with protocol BLM shares with SHPO.

Response: This recommendation has been added to Section 2.2.5.

Comment Number: #4-1

Comment: Offers language regarding consultation with military and joint analysis of impacts to military missions from any BLM land use decisions.

Response: As an interested party and user of the airspace over SFO-administered lands, the Navy would be appropriately notified and given an opportunity to provide input on proposed actions, along with members of the interested public and other Federal, State, and local agencies. The following text has been added to Chapter 1 of the PRMP / FEIS: "BLM would consult with the military and jointly analyze any impacts to the military mission including; Military Operating Areas (MOAs), Military Training Routes (MTRs), air space, coastal, and ground access, when making any land use decisions on BLM property at the earliest possible time to minimize impacts to current and future military mission uses. Examples of land uses that could impact the military mission include, but are not limited to: habitat improvement projects, environmental restoration projects, public utility development (e.g., erection of cell phone towers, electrical transmission lines, wind energy towers and solar array towers), large mining developments, recreational development (e.g., campgrounds, visitor centers), and land exchanges for the purpose of facilitating the preceding land uses."

Comment Number: #29-1

Comment: RMPs do not provide justification for decisions recommended that appear to be incompatible with the County.

Response: BLM believes that the choice of management actions, including those that appear to be incompatible with the County, provides the best balance of public access and resource protection. BLM has addressed the County's specific comments in the preceding sections of this appendix.

Comment Number: #29-3, #29-7

Comment: Coordination with other field offices (i.e., Carson City) has not occurred. RMP does not adequately address migration corridor locations or protective measures. Need extensive coordination and information sharing among four area offices (including Carson City), CA Dept of Fish and Game, and the Nevada Dept of Wildlife regarding migration and corridor protection that should be included in RMPs.

Response: BLM has consulted, coordinated, and/or collaborated with a number of Federal, State, and county/local agencies in the ongoing management of lands in the SFO and in development of the Proposed RMP, as discussed in general terms (in Chapters 1 and 5 of the PRMP / FEIS) and in more specific terms in various resource sections throughout the document. We recognize that further consultation and coordination – through formal (agreements, MOUs) and informal arrangements – will be required in many instances to successfully implement specific management actions proposed/identified in the PRMP / FEIS, and we will continue to coordinate with the appropriate agencies / entities in this regard. This includes continued coordination with State wildlife agencies in conducting environmental reviews and possible implementation of site-specific projects with potential wildlife impacts.

Comment Number: #29-6

Comment: Requested revision to 2.23.5: projects that involve inter-basin transfer of water would be coordinated and consistent with the local water resource policies and plans of local and regional governments.

Response: After careful consideration, we have decided not to change the language regarding interbasin transfer of water.

Comment Number: #29-10

Comment: RMPs should be updated in light of the National Energy Act proposed Trans-Sierra Route alternatives and recognize that such energy transmission corridors and related facilities siting be coordinated and consistent with DOE together with policies and programs of Lassen County and Lassen Municipal Utility District.

Response: BLM is aware of the ongoing study to identify east-west corridor routes and is a cooperating agency for preparation of a *West-wide Energy Corridor Programmatic EIS* (PEIS). The Draft PEIS is scheduled to be issued in winter 2006-2007. As such, BLM will work with other agencies in designating appropriate energy corridors on Federal lands in 11 western states, perform any environmental reviews required to complete corridor designation, and incorporate designated corridors into relevant agency land use plans. Section 2.7.2 of this PRMP / FEIS has been revised to address the need for an east-west corridor transmission route.

Comment Number: #33-3

Comment: Request copy of BLM GIS database used to formulate preferred alternative – to assist MNF in its LRMP revision process.

Response: The BLM GIS maps and certain datasets are available from the local field office.

Comment Number: #34-2

Comment: Include text about coordinating prescribed fire projects with the adjacent BLM field office due to potential negative impacts on special events on down-wind public lands. (page 2-7, 2.1.5)

Response: Prior to conducting any prescribed fire projects, BLM would prepare a project-level review (environmental assessment) that would analyze site-specific impacts (including impacts to areas down wind). Such projects would be coordinated with all potentially affected parties, including adjacent or nearby landowners, prior to implementation. Any prescribed fire project also would be carefully timed and managed in such a manner that Federal (CAA), state, and local standards for particulate matter (PM_{10}) are not exceeded. Smoke management plans would continue to be written and implemented for all prescribed fires, and would include information and techniques used to reduce or alter smoke emission levels. Site-specific information would also be used to assist fire managers in determining what weather conditions, firing methods, and mop-up standards should be used to minimize impacts.

Comment Number: #35-6, #35-7

Comment: Recommend coordination with Sheldon NWR regarding any decisions that may affect this refuge, if BLM is not already doing this. Given BLM lands are immediately adjacent to Sheldon NWR, BLM should complete a consistency evaluation for any proposed management actions that could impact fish and wildlife habitat on the refuge.

Response: As a matter of practice, BLM coordinates with the Sheldon NWR on many wildlife and habitat issues. BLM has no authority to implement management actions on NWR lands, hence no proposed management actions by BLM in this PRMP would adversely affect wildlife habitats on NWR lands.

Comment Number: #36-6

Comment: A number of waters are listed as being in violation of State standards, yet no formal process in place to notify the Regional Board when monitoring results show that standards have been violated. BLM relies primarily on the Water Quality Control Board to identify impaired waters or high probability of impaired water (page A-36). However, if BLM is sampling these waters and Lahontan staff does not receive the data, how is Lahontan staff to determine if waters are impaired or not? There clearly needs to be a formal process for sharing of monitoring data. Perhaps could be addressed in Statewide MAA being developed by BLM and State Water Resources Control Board. Need to set up meeting and coordinate further on data collection and sharing.

Response: A formal process to verify any impairment and / or correct any problem will be addressed in the MAA that is currently being developed by the BLM California State Office and the California State Resources Control Board. The SFO is waiting for the MAA to be completed and a formal process to be developed so water quality data collected can be shared between both agencies.