



**CALIFORNIA  
WILDERNESS  
COALITION**

*The Voice for Wild California*

January 9, 2005

Project Manager  
National Vegetation EIS  
BLM Nevada State Office  
P.O. Box 12000  
Reno, NV 89520-0006

***Re: Draft Programmatic Environmental Impact Statement and  
Environmental Report for Vegetation Treatments on Public Lands  
Administered by the Bureau of Land Management in the Western  
United States***

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Dear Sir or Madam:

**1** These comments on the Draft Programmatic Environmental Impact Statement (DPEIS) and Environmental Report for Vegetation Treatments on Public Lands Administered by the Bureau of Land Management (BLM) in the Western United States are submitted on behalf of the California Wilderness Coalition (CWC).

**2** The CWC is a non-profit organization that works to defend and protect California's last remaining wild places. We welcome the opportunity to participate in the public input process for this project.

**3** Please consider the following comments while preparing the Final Environmental Impact Statement:

**4** **The California Wilderness Coalition supports the use of prescribed fire and wildland fire use in designated wilderness, wilderness study areas (WSA), and areas with wilderness characteristics.** We lament the fact that catastrophic wildfires are increasingly occurring as a result of fire suppression efforts that have disrupted our fire-dependent ecosystems. The CWC is committed to working with the BLM to help restore fire to our wild landscapes and we believe that areas with wilderness characteristics are appropriate for fire treatments.

**5** **Mechanical treatments should be avoided in designated wilderness, WSAs, and areas with wilderness characteristics.** The CWC opposes mechanical treatments in existing wilderness areas and wilderness study areas. In addition, the BLM manages thousands of acres of wilderness quality land that are wild in character but not included in existing wilderness study areas or designated wilderness areas. These wild places are not appropriate for mechanical treatments.

6 The DPEIS fails to consider an alternative that prohibits mechanical treatments in areas with wilderness characteristics. Council on Environmental Quality (CEQ) regulations require a reasonable range of alternatives to be presented and analyzed in the EIS so that issues are “sharply defined” and the EIS provides “a clear basis for choice among options . . .” 40 C.F.R. § 1502.14. CEQ regulations and court decisions make clear that the discussion of alternatives is “the heart” of the NEPA process. Environmental analyses must “[r]igorously explore and objectively evaluate all reasonable alternatives.”

7 Given the extensive concern for WSAs and other areas with wilderness characteristics demonstrated during the scoping process, the BLM should have prepared an action alternative that responds to these concerns. This violates NEPA’s requirements to develop a full range of alternatives and to explore each in detail (40 CFR 1502.14, 1505.1).

8 **Mechanical treatments should not occur in areas with non-motorized recreation management objectives.** Before mechanical treatments are used managers should consider whether the area is managed for motorized or non-motorized recreation. Areas that are currently managed for non-motorized recreation (such as those managed under a semi-primitive non-motorized recreational opportunity spectrum) should not be subjected to mechanical treatments.

9 The DPEIS fails to consider that the use of heavy machinery for mechanical treatments will likely create de facto off road vehicle routes and lead to unauthorized motorized recreation that can jeopardize wilderness values, wildlife habitat, and water quality. Mechanical treatments will jeopardize the non-motorized recreation uses during and after treatment periods. During the application of mechanical treatments, the use of heavy machinery will disrupt wildlife habitat and recreational activity. After mechanical treatments are implemented, the heavy machinery used for such treatments is likely to leave permanent trails that could encourage unauthorized motorized use and jeopardize the isolation, serenity and peacefulness of non-motorized recreation areas.

10 The DPEIS states “There would be some short-term scenic degradation, as well as distractions to users (e.g., noise from machinery), from treatments” (4-117). However the DPEIS does not acknowledge the potential for mechanical treatments, and the use of heavy machinery required for such treatments, to create future routes for unauthorized off road vehicle use. Such use will encourage the spread of noxious weeds and undermine the intent of the treatments. Furthermore, unauthorized off road vehicle use in areas managed for non-motorized recreation will degrade habitat and wilderness values on BLM lands. These impacts are not analyzed in the DPEIS.

11 The DPEIS states “The focus of the PER is not to restrict, limit, or eliminate FLPMA-authorized activities as a means to restore land health” (1-6). Yet by allowing mechanical treatments in areas with wilderness characteristics, the plan is likely to encourage motorized uses that are inconsistent with land use plans. As a result, the plan will negatively impact non-motorized recreation in areas that were planned as such in local land use plans.

- 12 **The DPEIS fails to establish Best Management Practices for vegetation treatments.** The DPEIS fails to describe specific measures to minimize dispersal of invasive and non-native vegetation. The Final PEIS should require development of Best Management Practices to minimize the dispersal of invasive weeds and require BLM employee and contractor compliance with these practices.
- 13 **The DPEIS fails to sufficiently specify criteria to guide managers in the selection of vegetation treatment methods.** The DPEIS states “Vegetation treatment methods are selected based on several parameters, which *may* include...” (2-9). Instead of suggesting what might be used as a guide to select treatment methods, the DPEIS should lay out specific criteria to guide management decisions. These criteria should include consideration of an area’s wilderness values and proximity to existing communities.
- 14 The Vegetation Treatment Method Selection should include a consideration of the treatment area’s wilderness values. The DPEIS currently states that managers will consider an area’s land use before selecting a treatment method but the method selection does not direct managers to take special consideration for areas with wilderness characteristics.
- 15 The Vegetation Treatment Method Selection should include a consideration of an area’s proximity to existing communities. Areas that are not immediately adjacent to existing communities should be considered appropriate for fire treatments instead of mechanical treatments.

Thank you for your consideration of these comments.

Sincerely,



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