



DRAFT V.2. --December 11, 2015

BLM Carson City District
5665 Morgan Mill Rd.
Carson City, NV 89701
Attn: Colleen Sievers, Project Manager

RE: Comments on Greater Sage Grouse Bi-State Distinct Population Segment

Dear Ms. Sievers:

This correspondence contains formal comments of the Blue Ribbon Coalition (BRC), a national trail-based recreation group, regarding potential changes to the Proposed Plan(s) as set forth in the Greater Sage Grouse Bi-State Distinct Population Segment Forest Plan Amendment/Final Environmental Impact Statement.

This document shall not supplant the rights of other BRC agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received. For purposes of this comment document, the Greater Sage-Grouse will be referred to hereafter as the Grouse.

BRC has determined, after reviewing the documents, that it is unclear exactly what changes, if any, are being proposed for OHV activity. There is language discussing possible impacts associated with 4 mile lek buffers for OHV riding, as well as seasonal restrictions from March 15 to June 30 for OHV permitted events. These changes have no scientific support and would severely impact OHV riders and permitted events. Again, it is unclear if the agency is proposing these changes.

BRC believes there have been awkward twists in this planning effort which have frustrated the public's ability to meaningfully participate in the process. BRC voices our strong opposition to any restrictions on OHV use beyond those specifically disclosed in the DEIS. We object to the substance of any such additional restrictions, as well as the procedural violations such as inadequate disclosure in violation of NEPA.

Our December 17, 2013 comment letter stated BRC had reviewed all the relevant literature and issues concerning the current planning process undertaken by the BLM and its National Greater Sage-Grouse Planning Strategy (Charter). We also reviewed current OHV/ORV literature and statistics from the USDA Forest Service as it applies to use trends and to management on the ground. These trends cross directly

over to the BLM and can be used to justify sound management techniques for motorized recreation regardless of the differing Code of Federal Regulations that govern each agency.

In reviewing the available literature and studies listed in our December 17, 2013 letter, BRC noted there is scant to little information anywhere related to the effects of motorized recreation on the Grouse and there are no definitive studies to that effect cited anywhere in the database. Particularly considering the intense scrutiny and collective scientific energy expended on this species, BRC concludes that motorized recreation in any of its forms does not have a significant impact on the Grouse.

BRC reiterates the remaining comments previously submitted, and particularly the components of our "common sense strategy" for vehicular recreation. We incorporate those comments by reference here.

We wish to emphasize our strong opposition to reliance on "new" information as a basis for 4 mile lek buffers or other OHV-focused restrictions based on Grouse management. We particularly address the USGS Open-File Report 2014-1239 "Conservation Buffer Distance Estimates for Greater Sage-Grouse - a Review." This report is not new "science" but purports to be a review of prior research. The only discussion of transportation or vehicle-related impacts involves highways or county roads. These structures and associated vehicle use are not remotely comparable to OHV travel on dirt trails or two-track ways. The 2014 USGS Report cannot form a rational basis for restrictions on historical OHV travel on such dirt routes.

BRC does understand that OHV-related site-specific research may be needed to fine tune vehicle-based recreation on roads, trails, and areas so that future motorized access can be best tailored to the biological needs of Grouse. We welcome this effort, provided it reflects properly conducted, peer reviewable research.

CONCLUSION

BRC strongly feels that the agency's goals and objectives to protect the Bi-State Sage Grouse habitat can be met without severely limiting or restricting responsible managed motorized recreation uses within the planning area. Thank you for this chance to comment and we look forward to assisting in completion of the NEPA process, subsequent review and implementation.

Sincerely yours,

Don

Don Amador
Western Representative
BlueRibbon Coalition, Inc.
555 Honey Lane
Oakley, CA 94561
Office: (925) 625.6287
Email: brdon@sharetrails.org