

Sagebrush Ecosystem Program

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STATE OF NEVADA
Sagebrush Ecosystem Program

SAGEBRUSH ECOSYSTEM COUNCIL
STAFF REPORT
MEETING DATE: January 23, 2014

DATE: January 17, 2014
TO: Sagebrush Ecosystem Council Members
FROM: Sagebrush Ecosystem Technical Team
Telephone: 775-684-8600
THROUGH: Tim Rubald, Program Manager
Telephone: 775-684-8600, Email: timrubald@sagebrusheco.nv.gov
SUBJECT: Discussion and consideration of draft Sagebrush Ecosystem Program comments and cover letter on the BLM/USFS Nevada and Northeastern California Sub-Regional Greater Sage-Grouse Draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (DEIS).

SUMMARY

This item presents draft comments and a cover letter, prepared by the SETT on the BLM/USFS Nevada and Northeastern California Sub-Regional Greater Sage-Grouse Draft LUPA/DEIS (hereafter DEIS) for SEC review, discussion, and consideration. The SETT anticipates continuing to review the DEIS up until the January 29, 2014 deadline, and may develop additional comments or refine comments presented herein. However, the additions or refinements would be in a tone similar to those presented in this item.

The comments presented today are solely on the DEIS document itself and do not reflect SEC approved revisions to the State Alternative. The SETT is working with BLM/USFS staffs to incorporate those changes into the Final EIS.

PREVIOUS ACTION

July 30, 2013. The Council adopted the Sagebrush Ecosystem Strategic Detailed Timeline, which included review of the DEIS.

November 18, 2013. The Council directed the SETT to compile comments on the DEIS and submit them on behalf of the Sagebrush Ecosystem Program.

December 18, 2013. The Council discussed possible comments to be developed on specific sections of the DEIS.

January 8, 2014. The Council discussed draft comments on the DEIS submitted by the SETT and directed the SETT to develop a cover letter to accompany the comments.

DISCUSSION

On December 9, 2011, a Notice of Intent was published in the Federal Register to initiate the BLM/USFS Greater Sage-grouse Planning Strategy across ten western states. The BLM and USFS are preparing LUPAs with associated EISs for LUPs containing sage-grouse habitat range-wide. The BLM/USFS are pursuing this to respond to USFWS' March 2010 "warranted, but precluded" ESA listing petition decision for the greater sage-grouse. The USFWS identified inadequate regulatory mechanisms as one of the significant factors in their findings on the petition to list sage-grouse. The USFWS identified the principle regulatory mechanisms for the BLM/USFS to be conservation measures outlined in LUPs.

This agenda item addresses the DEIS for the Nevada and Northeastern California sub-region, one of 15 sub-regions currently undergoing the concurrent planning process for greater sage-grouse. The DEIS has six alternatives for analysis and consideration:

- Alternative A: No Action Alternative
- Alternative B: National Technical Team (NTT) Report Alternative
- Alternative C: Western Watershed Project Alternative
- Alternative D: BLM/USFS Agency Alternative (*currently the preferred alternative*)
- Alternative E: State of Nevada Alternative
- Alternative F: Wild Earth Guardians' Alternative

This agenda item presents draft comments on the DEIS prepared by the SETT. The comments presented today are solely on the DEIS document itself and do not reflect SEC approved revisions to the State Alternative. The SETT is working with BLM/USFS staffs to incorporate those changes into the Final EIS. Due to the size and importance of the document, the SETT anticipates continuing to review the DEIS up until the January 29, 2014 deadline, and may develop and refine comments, similar to those presented in this item. The SETT would welcome guidance from the SEC on the possible development of additional comments on specific items and direction on how to proceed with further development of the comments.

FISCAL IMPACT

There is no fiscal impact at this time.

RECOMMENDATION

Staff recommends the SEC discuss the comments prepared by the SETT and provide additional comments developed by the SEC to the SETT in a workshop format. The SETT recommends the SEC approve the DEIS comments, authorize the Chairman to sign the corresponding cover letter, and direct the SETT to submit the comments and cover letter to the BLM/USFS

POSSIBLE MOTION

Should the Council agree with the staff recommendations, a possible motion would be:

“Motion to approve the proposed comments on the DEIS, authorize the Chairman to sign the corresponding cover letter, and direct the SETT to submit comments and the cover letter to the BLM/USFS.”

Attachments:

1. DRAFT Sagebrush Ecosystem Program Comments and Cover Letter on the Nevada and Northeastern California Greater Sage-Grouse Draft LUPA and EIS.

mf: TR

BRIAN SANDOVAL
Governor



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STATE OF NEVADA
Sagebrush Ecosystem Program

January 23, 2014

Amy Lueders, Nevada State Director
BLM Nevada State Office
1340 Financial Boulevard
Reno, NV 89502

William Dunkelberger, Forest Supervisor
Humboldt-Toiyabe National Forest
1200 Franklin Way
Sparks, NV 89431

RE: Nevada and Northeast California Sub-regional Greater Sage-Grouse Draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (EIS)

Dear Ms. Lueders and Mr. Dunkelberger,

The Sagebrush Ecosystem Council (SEC) on behalf of the State of Nevada appreciates the opportunity to participate in the review of the above mentioned document. This effort by the BLM and USFS represents an unparalleled planning effort to achieve sage-grouse conservation in our state, which complements the efforts by the State of Nevada. The SEC also appreciates the continued close coordination between your staffs and the Sagebrush Ecosystem Technical Team (SETT).

The SEC would like to reiterate it is the desire of Governor Brian Sandoval, as recommended by the SEC, for the State's Alternative (Alternative E) to be selected as the BLM's preferred alternative. The Governor's SEC represents a unified, broad, stakeholder effort to produce a plan to protect sage-grouse through a public and transparent process.

The SEC is encouraged that the BLM/ USFS have incorporated key elements of Alternative E, such as the Conservation Credit System and coordination with the SETT into the BLM/ USFS Alternative (Alternative D). However, the SEC is concerned that the BLM/ USFS have currently selected Alternative D as the preferred alternative in the DEIS rather than Alternative E. Alternatives D and E share the same overarching goal of no net unmitigated loss of sage-grouse habitat; however, the two alternatives propose different visions of how to achieve this goal. The SEC is concerned about the BLM's proposal of a blanket policy to exclude new recreational facilities; utility-scale wind and solar energy facilities; salable mineral development; non-energy leasing minerals; no-surface occupancy restrictions for fluid minerals; in all sage-grouse habitat. This appears to be regardless of sage-grouse population density, consideration of seasonal habitat requirements, or importance of habitat to individual populations. These proposed actions contradict BLM's and USFS' multiple-use mandate, governed by the Federal Land Policy and Management Act of 1976 and National Forest Management Act of 1976 respectively.

The SEC recommends the BLM/ USFS consider Alternative E's hierarchical decision process of "avoid, minimize, and mitigate" to achieve no net unmitigated loss of sage-grouse habitat in the selection of the final alternative. This includes the SETT consultation process and the Conservation Credit System to assure that this policy is applied consistently throughout the state. The SEC believes this is the best approach because it is pragmatic and effective for achieving sage-grouse conservation, while maintaining the culture and economic vitality of the state.

The BLM/ USFS have requested more detail and specificity on elements of the State Alternative to assist in your analysis. To this end, the SEC has approved revisions to the State Plan/ Alternative, which include more detail on the “avoid, minimize, mitigate” policy and SETT consultation; Site Specific Consultation Based Design Features (further developed from BLM/ USFS Required Design Features); and adoption of sage-grouse habitat objectives (Table 2.6 in the DEIS). The SEC encourages the BLM/ USFS to thoughtfully consider these changes when selecting the final plan. The SETT has already submitted these documents to your staffs. Please continue to work with them to incorporate these revisions into the Final EIS.

The SEC is also strongly opposed to alternatives that would either partially or completely eliminate livestock grazing from all sage-grouse habitat or lower utilization rates, principally Alternatives C and F. The SEC acknowledges that while improper livestock grazing can negatively impact sage-grouse and their habitat, proper livestock grazing can have beneficial or neutral impacts. In order to provide a more robust description of proper livestock grazing for the BLM/ USFS to consider in this section, the SETT is currently working closely with the Science Work Group to develop a revised version of the livestock grazing section of Alternative E based on the best available science. The SETT will continue to work with BLM/ USFS staffs to incorporate these revisions into the Final EIS.

The SEC believes that Alternatives C and F are inappropriate for the State of Nevada due to the complete or partial elimination of grazing in these alternatives respectively; creation of extensive Areas of Critical Environmental Concern (ACECs); and exclusion of most land uses throughout the planning area. The SEC will not be able to support a final plan that includes these elements.

In addition, the SETT on behalf on the SEC will be submitting more detail on the Conservation Credit System; draft Habitat Suitability Map developed by USGS; and updated management maps with revised management categories for inclusion and consideration in the Final EIS. Please continue to work with the SETT to incorporate these items into the Final EIS.

Specific and detailed comments on the DEIS are attached. The SEC encourages the BLM/ USFS to thoughtfully consider the revisions to Alternative E while selecting the final plan for the Final EIS. Thank you again for your time and consideration on this matter. If you have any questions regarding these comments, please don't hesitate to contact the SETT at 775-684-8600.

Sincerely,

J.J. Goicoechea, Chairman
Sagebrush Ecosystem Council

cc: The Honorable Brian Sandoval, Governor
Mr. Ted Koch, State Supervisor USFWS
Mr. Leo Drozdoff, Director Department of Conservation and Natural Resources
Mr. Tony Wasley, Director Nevada Department of Wildlife
Mr. Jim Barbee, Director Department of Agriculture
Mr. Jim Lawrence, Administrator Division of State Lands
Mr. Tim Rubald, Sagebrush Ecosystem Program Manager

Ch/ App	Section	Page #	Text Referencing	Comment
Ex. Summary	ES.10.1	xxxviii	Alternative A: No Action	Reword to clarify: the sentence is currently worded as "...would develop new management actions for to protect" Suggest removing the word "for" and leaving the word "to".
Ex. Summary	ES.10.5	xxxix	Alternative E	replace "or" with "and" in "...avoid, minimize, or mitigate strategy..." This correction is obtained from the Nevada State Plan Section 3.1.2 Conservation Policies - "Avoid, Minimize, Mitigate"
Exec Sum		xxiv (xxxvi)	ES.8.5 Alternative E	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
Exec Sum		xxvii (xxxix)	ES.10.4 Alternative D; 2nd bullet	It is unclear why BLM would propose excluding all wind and solar energy development, while BLM is also proposing ROW avoidance for the planning area. Wind and solar energy development may not have negative impacts on GRS in all areas mapped as habitat. The ROW avoidance policy would allow for the BLM to say no to wind and solar projects that would have negative impacts on GRS and allow those that may have neutral impacts to proceed.
1	1.2	1-6 and 1-7 (6 and 7)	Table 1.1., 1.3,	The totals for PPH in these two tables are not the same. It is unclear why they are not the same. In addition the totals do not appear to be summed correctly for PGH and Total Acres in Table 1.1 or for PPH, PGH, and Total Acres in Table 1.3. Even if the sums are corrected they do not match between tables. This should be corrected or clarifying text should be provided.
1	1.2	1-7 (7)	Table 1.4.	The totals for PPH, PGH, and Total Acres in this table are equal to or greater than the values in Tables 1.1. and 1.3. Because this is just for BLM lands, and not for FS lands, it would be expected that these numbers would LESS than those in Tables 1.1 and 1.3. This should be corrected or clarifying text should be provided.

Ch/ App	Section	Page #	Text Referencing	Comment
1	1.7.6	26	Memorandums of Understanding	3." Juniper-Pinyon Partnership Project" should be rewritten as "Pinyon-Juniper Partnership Project"
2	2.4.5	2-14 (46)	Alternative E section; 1st paragraph	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
2	2.8.2	2-89 (121)	Table 2.4; asterisk at bottom of table	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
2	2.8.2	2-93 (125)	Table 2.5; Action D-SSS-AM 2	Change to consult with NDOW and SETT
2	2.8.2	2-131 (163)	Table 2.5; Action D-VEG 19	What is BLM's justification for this management action? Provide a citation if this action is to remain in the alternative.
2	2.8.2	2-131 (163)	Table 2.5; Action D-VEG 20	Add to this action "unless grazing is part of the vegetation treatment design" to match the language in Action D-VEG 20.
2	2.8.2	2-131 (163)	Table 2.5; Action D-VEG 19 & 20	The State is greatly concerned about the implications of these management actions. Under this scenario, a permittee would not be allowed to graze their allotment for a total of three years if a vegetation treatment was to occur on their allotment. This may discourage permittees participating in vegetation treatments on their allotments. Taking into consideration that livestock grazing is the most widespread use of public lands in Nevada, this may severely limit the ability to accomplish much needed vegetation management treatments on the ground. It may also discourage permittees from participating in the Conservation Credit System, developed as part of the State Alternative and adopted by the BLM in the Agency Alternative. The State encourages the BLM to consider these implications when selecting the preferred plan.

Ch/ App	Section	Page #	Text Referencing	Comment
2	2.8.2	2-168 (200)	Table 2.5; Action(A-F)-FFM-HFM-7	There are no actions listed in this row. Remove row.
2	2.8.2	2-173 (205)	Table 2.5; Action C-FFM-HFM 10	How is "good or better ecological condition" being defined here and what are the implications for management?
2	2.8.2	2-181 (213)	Table 2.5; Action F-FFM-HFM 25	Does this action really propose constructing livestock enclosures (i.e. fencing) around all post-fire recovery areas? Fires in Nevada can burn in excess of hundreds of thousands of acres. If this is selected then fencing would have to be constructed around these massive burn areas? Who would pay for this? Putting up so much additional fencing would lead to increased strike risk and could negatively impact GRSG populations. These actions may provide habitat protection and be practical for smaller fires. Please specify the fire size this action would apply to.
2	2.8.2	2-182 (214)	Table 2.5; Action C-FFM-HFM 28	Clarification is needed on this action. Does this exclude other treatment methods or other existing vegetation in regards to fuels reductions treatments?
2	2.8.2	2-195 (227)	Table 2.5; Action D-LG 2	Why does this management action only apply to nesting habitat? What will the BLM do for brood rearing and winter habitat?
2	2.8.2	2-196 (228)	Table 2.5; Action D-LG 4	What does the term "future management applications" mean in this context? This is too broad and leaves open to interpretation and inconsistent application across BLM districts. The BLM should add more specificity or eliminate this action
2	2.8.2	2-214 (246)	Table 2.5; Action D-LG-D 1	What does the term "appropriate changes" mean? This is too broad and leaves open to interpretation and inconsistent application across BLM districts. The BLM should add more specificity or eliminate this action.

Ch/ App	Section	Page #	Text Referencing	Comment
2	2.8.2	2-215 (247)	Table 2.5; Action D-REC 2	Is there scientific literature on the effects on sage-grouse from development of facilities for recreational activities such as hiking and camping? It is not mentioned in the NTT report. The BLM should have a scientific basis for proposing such a draconian management action, such as not allowing new recreational facilities in all PPMAs and PGMAAs. If the BLM does not have scientific justification, then it should be eliminated from consideration in the final plan, particularly since it conflicts with the BLM's multiple-use mandate.
2	2.8.2	2-268 (300) - 2-322 (354)	Table 2.5	This section on the table is repeated. Eliminate from final version
2	2.8.2	2-322 (354)	Table 2.5; asterisk at bottom of table	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
2	2.5	258	Action E-LR-LUA 7: TMA-9.3:	Suggest removing of last sentence in this section. It appears redundant.
2	2.5	312	Action E-LR-LUA 7: TMA-9.3:	Suggest removing of last sentence in this section. It appears redundant.
2	2.8	364	Alternative E	Replace "...Mitigation Bank Program." with " ...Conservation Credit System." This is found in the first sentence in column labeled Alternative E.
2	2.5.2	2-18 (50)	"The BLM, Forest Service, and other conservation partners use the resulting information to guide implementation of conservation activities."	Second to last paragraph... unclear what "resulting information" is relating to. What information is this sentence referencing?
2	2.5.2	2-18 (50)	Starting with..."Standardization of monitoring methods and implementation"	The bottom three paragraph on this page are poorly written and unclear in what concept is to be conveyed. They are disconnected and inconsistent tense in use.

Ch/ App	Section	Page #	Text Referencing	Comment
2	2.5.2	2-19 (51)	"Indicators at the fine and site scales will be consistent with the Habitat Assessment Framework; however, the values for the indicators could be adjusted for regional conditions."	Habitat Assessment Framework - needs citation Stiver et al 2010 (this is already in the references section).
2	2.5.3	2-20 (52)	Starting with, " Adaptive Management Plan The BLM and Forest Service...."	It should be stated by when this adaptive management plan will be developed and written.
2	2.5.3	2-20 (52)	Starting with, "The State of Nevada is updating a plan to provide more..."	The reference to State of Nevada monitoring and adaptive management plan is unclear in these two sentences. It states that the "BLM will evaluate this plan to the greatest extent possible" - Does this mean that the BLM intends to adopt it or that potentially the State of Nevada and the BLM may have separated Monitoring and Adaptive Management plans that may be different. Please provide clarification.
2	2.8.1	2-32 (64) and 2-41 (73)	On both pages, starting with, "In California, the BLM used a mapping method based ..."	This paragraph is repeated in part on these two pages. In addition, it is then unclear how this mapping method ties into the concept of PPH and PGH. Please provide further clarification.
2	2.8.2	2-50 (82)	"Sub-Objective D-SSS 3: —"	There is no Sub-objectives listed for Alt D, but seems that the Habitat Objectives Table, and the Monitoring Plan (Appdx E) and the Adaptive Management Plan that are part of this EIS would meet the same end. This Sub-objective should be updated.
2	2.8.2	2-99 (131)	"Action D-SSS-AM 7: The agencies would coordinate with the Nevada Sagebrush Technical Team on all proposed disturbances within the state of Nevada to meet the mutual goal of no unmitigated loss."	This would be more appropriated categorized as D-SSS-MIT 3 which is currently "D-SSS-MIT 3: -". This action relates more to mitigation than to adaptive management and would then line up with Action E-SSS-MIT 7 which gets at no net loss as well.

Ch/ App	Section	Page #	Text Referencing	Comment
2	2.8.2	2-100 (132)	Starting with, "Action D-SSS-AM 8: The BLM and Forest Service would coordinate with the Nevada Sagebrush..."	This would be more appropriately categorized as D-SSS-MIT 1, which is currently " D-SSS-MIT 1:-". This action relates more to mitigation than to adaptive management and would then line up with "Action E-SSS-MIT 1:..." which gets at the conservation credit system as well.
2	2.5	123	Action E-SSS 3: TMA 9.4	The State of Nevada currently has 5,000 raven take permits allocated annually, not the 2,000 as specified in the description of alternative actions. Change the second sentence from the current "2,000 bird limit"to "5,000 bird limit". Also, review the third sentence and consider removing it, due to redundancy.
2	2.5	134	Action E-SSS-MIT 1: PMA-3	The phrases "Mitigation Bank Program" and "central mitigation bank" to be replaced with "Conservation Credit System"
2	2.5	137	Alternative E; TMA-21.1	The phrases "Mitigation Bank Program" and "central mitigation bank" to be replaced with "Conservation Credit System"
2	2.5	142	Action E-SSS-ACDM 4	change third bullet point from "...Mitigation Bank Program." to "...Conservation Credit System."
2	2.5	144	Alternative E	change second bullet point wording that currently reads as "...Mitigation Bank Program (PMA-3)..." to "...Conservation Credit System (PMA-3)..."
2	2.5	146	Alternative E	At the top of the column, replace "Mitigation Bank Program" with "Conservation Credit System"
2	2.5	152	Alternative E; TMA-21.1	in the first sentence of this section, replace "...Mitigation Bank Program..." with "...Conservation Credit System...". In the second sentence replace "...this central mitigation bank,..." with "...this state operated conservation credit system,..."
4	4.3.1	4-13 (605)	8th bullet starting with "Short-term impacts..."	How did BLM arrive at the conclusion that short-term impacts are up to ten years and long-term impacts exceed ten years. This seems arbitrary. Please include a citation if this is to remain in the document.

Ch/ App	Section	Page #	Text Referencing	Comment
4	4.3.1	4-13 (605)	9th bullet starting with " Because GRSG are highly..."	The first part of this sentence is scientifically accurate but the conclusion is a faulty and misguided assumption to base the analysis of the alternatives on. What type of "disturbances" are being referred to here? A vegetation manipulation project can be considered a disturbance but is proposed throughout the BLM and other alternatives. What type of "protections" are being referred to here? This is unclear and may lead to an underlying faulty analysis of the alternatives.
4	4.3.2	4-15 (607)	Livestock Grazing Management subsection	The effects of livestock grazing are being misrepresented in this section. Livestock grazing can have a not only a negative effect on sage-grouse and their habitat, but also a neutral or positive effect as well. This extends far beyond reducing fuel loads as is suggested here. The statement that "grazing restrictions" only will enhance GRSG habitat and sagebrush ecosystem health is misleading and does not fully capture the breath of published peer-reviewed scientific literature on this matter. Please refer to the literature synthesis on this subject: Davies et al (2001) titled "Saving the sagebrush sea: An ecosystem Conservation plan for big sagebrush plant communities". Biological Conservation. 144: 2573-2584.
4	4.3.2	4-16 (608)	2nd paragraph; 3rd sentence	This statement needs a citation
4	4.3.2	4-18 (610)	Land Uses and Realty Management subsection	The BLM states here that "exclusion areas may result in more widespread development on private lands if government management lands could not be used", yet the BLM's own alternative proposes extensive exclusion areas (all PPMAs and PGMA's) for new recreational facilities, utility-scale wind and solar energy facilities, salable mineral development, and non-energy leasing minerals. This is an inconsistency that BLM should consider when selecting their preferred plan.

Ch/ App	Section	Page #	Text Referencing	Comment
4	4.3.2	4-20 (612)	Comprehensive Travel and Transportation Management subsection; 1st paragraph; last sentence	This statement needs a citation
4	4.3.8	4-44 (636)	1st paragraph; last sentence	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please refer to the letter submitted to BLM/ USFS dated July 1, 2013 as part of the ADEIS review. Please strike mention on this anywhere it appears throughout the document.
4	4.3.8	4-45 (637)	Table 4.25	Table 4.25; 4.26, and 4.27 essentially convey the same information and do not need to be repeated three times.
4	4.3.8	4-44 (637)	Impacts from Vegetation and Soils Management subsection; 1st paragraph; 1st sentence	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
4	4.3.8	4-46 (638)	Impacts from Leasable Minerals Management subsection; 1st paragraph; 2nd sentence	Alt E does not include NSO stipulations
4	4.3.8	4-47 (639)	Impacts from Leasable Minerals Management subsection	It is unclear what the findings of this subsection are.
4	4.3.8	4-47 (639)	Impacts from Salable Minerals Management subsection; 1st paragraph; 2nd sentence	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.
4	4.3.8	4-47 (639)	Impacts from Salable Minerals Management subsection	It is unclear what the findings of this subsection are.
4	4.3.8	4-48 (640)	Impacts from Land Uses and Realty Management subsection; 1st paragraph	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.

Ch/ App	Section	Page #	Text Referencing	Comment
4	4.3.8	4-48 (640)	Impacts from Land Uses and Realty Management subsection; last sentence	The State disagrees that Alt E is similar to Alt A in this instance and would provide few regulatory mechanisms to reduces impacts to GRSG. Alt E's avoid, minimize, mitigate policy is equivalent to a ROW avoidance. The State respectfully requests the BLM reconsiders the analysis of this subsection.
4	4.3.8	4-48 (640)	Impacts from Renewable Energy Management; last sentence	The State disagrees that there would be <u>more</u> wind and solar energy development under Alt E than Alt A. The State requests clarification on how BLM arrived at this conclusion.
4	4.4.8	4-69 (661)	Impacts from Vegetation and Soil subsection; sentence starting with, "However, this alternative would limit..."	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.
4	4.4.8	4-70 (662)	1st paragraph; sentence starting, "The dominance of chaetgrass..."	The BLM states here that the dominance of cheatgrass and medusahead cannot be rectified by simply removing cattle or by reducing their numbers. However, the BLM's alternative relies heavily on adjusting allowable use levels when allotments are not meeting GRSG habitat objectives (Table 2.6). By the same token, the BLM is considering two alternatives that would either eliminate grazing from public lands completely or reduce it by 25%. The BLM should carefully consider their own words stated here when selecting their preferred plan for livestock grazing.
4	4.4.8	4-70 (662)	Impacts from Wild Horse and Burro Management subsection	The State disagrees that Alt E for wild horse and burro management is the same as Alt A. Alt E proposes goals, objectives, and management actions that emphasize impacts to GRSG and their habitat in wild horse and burro management.
4	4.4.8	4-71 (663)	Impacts from Locatable and Salable Minerals Management subsection	Alt E's goal for no net loss of GRSG habitat and the Conservation Credit System needs to be included in the analysis of this section.
4	4.4.8	4-71 (663)	Impacts from Land Uses and Realty Management subsection	Alt E's goal for no net loss of GRSG habitat and the Conservation Credit System needs to be included in the analysis of this section.

Ch/ App	Section	Page #	Text Referencing	Comment
4	4.4.8	4-71 (663)	Impacts from Renewable Energy Management subsection	Alt E's goal for no net loss of GRSG habitat and the Conservation Credit System needs to be included in the analysis of this section.
4	4.5.8	4-91 (683)	Impacts from Wild Horse and Burro Management subsection	The State disagrees that Alt E would be equivalent to Alt A (no action.) The State contends that Alt E would be similar to Alt D in this instance.
4	4.5.8	4-92 (684)	1st sentence	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.
4	4.5.8	4-92 (684)	Impacts from Land Uses and Realty Management subsection	Alt E's policy of avoid, minimize, mitigate is equivalent to ROW avoidance.
4	4.8.8	4-125 (717)	1st paragraph; 1st sentence	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
4	4.8.8	4-126 (718)	Impacts from Livestock Grazing Management subsection	The State disagrees that Alt E would be the same as Alt A in this instance. Please refer to TMA-12 of the State Alternative originally submitted to the BLM. This provides for the use of livestock grazing for fuels reduction.
4	4.9.8	4-148 (740)	last paragraph; last sentence; "Alternative E does not contain the BLM regulatory mechanism."	The State requests clarification on what exactly "the BLM regulatory mechanism" is.
4	4.12.8	4-170 (762)	Impacts from Lands Uses and Realty subsection	Alt E also includes an objective of no net loss of GRSG habitat and is similar to ROW avoidance. This needs to be considered in the analysis.
4	4.13.8	4-179 (771) - 4-180 (772)	Alternative E section; 1st paragraph	This section fails to include Alternative E's overarching avoid, minimize, mitigate policy in the analysis. This is necessary in order for a complete and through analysis of Alternative E.
4	4.13.8	4-180 (772)	Impacts from Land Uses and Realty Management subsection; 1st sentence	Alternative E's policy of avoid, minimize, mitigate is equivalent to ROW/ SUA avoidance. Therefore, impacts from Alternative E would be similar to Alternative D and not Alternative A (no action).

Ch/ App	Section	Page #	Text Referencing	Comment
4	4.14.1.5	4-187 (779)	Impacts from Land Uses and Realty and Leasable Minerals Management subsections	The State contests that Alternative E's impacts on fluid minerals would be <i>less</i> than those described in Alternative A. Alternative E details an avoid, minimize, mitigate policy that would provide more restrictions than current management (Alternative A), not less.
4	4.14.2.4 & 4.14.2.5	4-191 (783)	Alternative D and Alternative E sections	Under Alternative D, it states that mitigation <i>could</i> be requested and under Alternative E is states that mitigation <i>would</i> be requested for locatable minerals. Please clarify the distinction between alternatives. In this instance Alternative E would be stronger than Alternative D.
4	4.16.8	4-212 (804) - 4- 214 (806)	Alternative E section - total	The State disagrees with the analysis of Alternative E's impacts on water resources. The underlying indicators that BLM includes in the methods and assumptions section for water resources include that indicators of impacts on water resources include 1)reduced activities that result in surface disturbance causing erosion and sedimentation and 2) more areas treated for fuels and invasive species. Alternative E includes an avoid, minimize, mitigate policy for anthropogenic disturbances that would address point one and extensive fire and fuels management and vegetation management, including invasive species that would address point two. Moreover, this section is inconsistent in the fact that many of the subsections conclude that Alternative E would result in fewer impacts than Alternative A, yet the overall conclusion of this section is that Alternative E is the same as Alternative A. BLM needs to reconsider its conclusion from the analysis already completed in the section and address these inconsistencies.
4	4.16.8	4-213 (805)	Impacts from Wild Horse and Burro Management subsection	Alternative E's section for Wild Horse and Burro Management have been inaccurately interpreted here. Alternative E maintains the existing herd areas, herd management areas, and wild horse territories, and emphasizes maintaining AML, with focus on SGMAs.

Ch/ App	Section	Page #	Text Referencing	Comment
4	4.16.8	4-213 (805)	Impacts from Locatable Mineral Management subsection	This subsection concludes that Alternative E could result in fewer impacts than Alternative A and the same impacts as Alternative A. Please clarify which one it is.
4	4.16.8	4-213 (805)	Impacts from Salable Mineral Management subsection	This subsection concludes that Alternative E could result in fewer impacts than Alternative A and the same impacts as Alternative A. Please clarify which one it is.
4	4.17.8	4-224 (816) - 4-225 (817)	Alternative E section for Tribal Interests	The analysis in this section is inconsistent with the analysis in the rest of this document. 1) Several subsections conclude that impacts from Alternative E would lead to decreases in GRSG populations. How did BLM arrive at this conclusion and why is it stated nowhere else in the document? 2) Why does the riparian areas, wetlands, and water resources subsection only take into account management actions for drought? This is dissimilar from analysis done elsewhere in this chapter. While Alternative E does not specify management actions for drought, it does specify other actions related to riparian areas, such as maintaining PFC. 3) It is incorrect that Alternative E does not have goals and objectives for livestock grazing and comprehensive travel and transportation management.
4	4.18.8	4-235 (827)	Alternative E section for Climate Change	While Alternative E does not identify management actions for climate change, it does constrain resource use and would decrease any GHG emissions associated with a particular use, similar to those described in the section for Alternative D. Therefore, Alternative E would not be the same as Alternative A.
4	4.19.2	4-248 (840)	Impacts from Management Action Affecting Wind Energy Development	Why is BLM unable to quantify these impacts at this time? Will BLM have sufficient data to analyze by the Final EIS?
4	4.3.8	4-45 (637)	Table 4.25	The citation "BLM and Forest Service 2013" is not in the References Section. However, there is a "BLM and Forest Service GIS 2013" which may be the correct citation. Please either add it or correct it.

Ch/ App	Section	Page #	Text Referencing	Comment
4	4.3.1	4-13 (605)	Third bullet. (VDDT is first presented in Chapter 3 p 3-26 but provides no real explanation.)	I was unable to find detailed methods and output on the VDDT modeling. As this modeling effort is critical to the analysis and conclusions reached in Chapter 4, additional detail should be provided to assure transparency of information and so that the reader can more easily understand what the VDDT modeling is, how it "works", and how conclusions were reached.
7		7-39 (955)	"Epanchin-Niell, R. S., M. B. Hufford, C. E. Aslan, J. P. Sexton, J. D. Port, and T. M. Waring. 2009. "Controlling invasive species in complex social landscapes." Front. Ecol. Environ. doi:10.1890/090029."	This citation is not correct- it is a paper on yellow star thistle. The intended citation is likely: "Epanchin-Niell, R., J. Englin, and D. Nalle. 2009. Investing in rangeland restoration in the Arid West, USA: Countering the effects of an invasive weed on the long-term fire cycle. Journal of Environmental Management 91:370-379."