

Comment Form

Document Title	BLM Pinyon Pine and Juniper Management Categorical Exclusion Verification Report
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			The Sagebrush Ecosystem Program is in full support of this improvement to the Categorical Exclusions list. The Conservation Credit System has an approved process to quantify this action on both private lands and public lands in order to generate mitigation credits. The SEP is highly favorable of site-specific P/J treatments due to the significant improvements that can be achieved for sage-grouse and sagebrush habitats. The SEP also has tools to determine the most meaningful locations for Pinyon-Juniper removal that will provide the greatest positive impact for greater sage-grouse.
1	1	Introduction, 3 rd paragraph opening sentence	This sentence may be too absolute or general depending on perspective. Consider adding “predominant” in front of evidence would be less absolute or adding a general example such as: “in previous CX or EAs focused on PJ removal for the benefit of wildlife species”.
1	2	Proposed Language (1)	Some indication of the common attributes of sites and projects that may be eligible through the application of a CX would be helpful.

1	2	Proposed Language (1)(a)	Non-native establishers and herbicide application may be necessary to prevent erosion and the spread of invasive or noxious plants. They may also aid in the recovery of soils and native plants. Consideration of the use of these species should be available, especially where invasive plants are a considerable threat to the area and could threaten the intent and success of a conifer removal project to benefit wildlife habitat.
1	2	Proposed Language (1)(a)	If the intended purpose of these CX's is to improve sage-grouse and mule deer habitat, then in some cases the removal of old growth trees to remove predator perches completely in an area may be necessary to include (or at least considered). If a cap of 1% of old growth trees were allowed, removal footprints may be designed to encapsulate the removal of all trees in areas that make sense for sage-grouse habitat improvement.
1	11	Methods b) Specific Actions... Last paragraph	Mosaics should be designed in ways that are most beneficial to sage-grouse and to maintain the best possible aesthetics. Creating patchy mosaics should be avoided.
1	14	Methods d) Intensity... 3 rd paragraph	The last sentence states that the environmental effects of Phase III removal are similar to treatments in the other stages. Clarification should be given here to only allow these treatments on case by case, site specific basis. State and transition models reveal a different story of further risk and reduced reward with Phase III removal. A high level of caution should be exercised prior to allowing these treatment types, keeping in mind that in order to benefit sage-grouse and potentially avoid creating 'biological sinks' all trees within the treatment perimeter would need to be removed. These types of treatment are likely to be prescribed to reduce fire risk rather than specific habitat improvements. The intent of the applicant should be made clear.
2	20	Peer-reviewed research findings	Significant science is discussed, but how the science is relevant to the methods often implemented may be important. For instance, the Bates et al. 2005 study relies on livestock exclusion to some extent, which may not be a part of most CX projects. Also, the science is different along the gradient of PJ dominance, which isn't considered in this analysis.

Methods 2.A.c	25	Wildlife Habitat; Sage Grouse	The Sagebrush Ecosystem Program recommends that when a Pinyon-Juniper removal treatment is conducted, that all trees in the area are removed to provide the greatest benefit to sage-grouse. Later research by Coates et al. documents that single trees in relatively close proximity can result in increased predation.
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