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June 29, 2015

Director (210)
Attn: Protest Coordinator
P.O. Box 71383
Washington, DC 20024-1383

Dear Director Kornze:

The Sagebrush Ecosystem Program (SEP), through the authority granted to us in NRS Chapter 232.162, is filing a protest on the Nevada and Northeastern California Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement (FEIS) as allowed by 43 CFR 1610.5-2. The SEP through the Sagebrush Ecosystem Technical Team (SETT) is a cooperating agency, filing comments on multiple drafts of the FEIS (all of which are attached hereto).

The SEP represents a unified, broad, stakeholder effort including USFS, BLM, and USFWS staff that created the State Plan and the CCS using the best available science, vetted through stakeholder, science work group, and public input all through a public process. The State of Nevada remains the first and only state to recognize our commitment to conservation of Greater Sage-grouse in statute (NRS 232), which created the SEP, representing multiple stakeholders as well as state and federal agencies. The State Plan includes a robust process for the avoidance and minimization of impacts from anthropogenic disturbances. In instances where impacts cannot be avoided or sufficiently minimized, the State created the CCS, a rigorous, scientifically based mitigation program that achieves net conservation gain for GRSG and a single method for determining mitigation across the entire Sage-grouse Management Area, covering approximately 48,627,000 acres in Nevada.

We appreciate the opportunity to participate in this process, and are encouraged by the use of parts of our 2014 Nevada Greater Sage-grouse Conservation Plan (State Plan) including mention of the Conservation Credit System (CCS). We remain troubled, however, that the State Plan was not used in its entirety and significant new federal agency actions were added that replaced important components of the State Plan. FLPMA and its implementing regulations require that BLM's land use plans be consistent with officially approved state and local plans. The State Plan *is* consistent with the purposes, policies, and programs of federal laws and regulations applicable to the public lands, is based on the best available data and science, addresses each of the threats identified by the Conservation Objectives Team (COT) report, was developed entirely in a public and transparent process, and is supported by a wide array of stakeholders across the State of Nevada. Therefore, the State Plan should be fully implemented as the preferred alternative in the FEIS. The full implementation of the FEIS, as currently written, will adversely impact the State due to, among other things, unnecessary land use allocations, an unnecessary disturbance cap, and unrealistic expectations to achieve certain habitat objectives solely through management actions.

The SEP is protesting the following items (not in any particular order):

Adaptive Management Triggers

Statement of issue: The SEP agrees that clearly defined, scientifically based methods to calculate program success based on both habitat and population trends are needed. However, we protest the adaptive management triggers in the FEIS as they include significant additions in comparison to the DEIS, which did not allow time for public review and comment. Not only was there inadequate opportunity to review or comment prior to the FEIS, but the incorrect citation was provided for the population trend methods, which again does not provide the public the opportunity to review or understand the scientific literature used to support the method for modeled growth rates. A large range in the rate of change proposed to reach a hard trigger for an individual lek (0.01-0.15) is quite different from the rate of change proposed to reach a hard trigger for a lek cluster or BSU (0.10). The interpretation of these numbers, the methods for setting the trigger values, and the rationale for widely different trigger values are unclear and warrant a sufficient period of time to allow an independent review of the proposed adaptive management triggers.

Consideration should also be given to the effects that predation may have on influencing population levels (Lockyer et al. 2013). Natural and man-caused effects (which may or may not be influencing predation) are being considered, but there is no mention of evaluating the potential significant effects caused by predation in the adaptive management section. Predator control should be considered as a component of population recovery or protection as warranted. While the effects of predation on sage-grouse may be an indicator of other habitat concerns (which may take decades to rehabilitate), predator control can be used as a stop-gap measure in the interim process (Coates and Delehanty 2004, Coates and Delehanty 2010).

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.7; Population Growth Rate Calculations for Triggers p. 2-80 to 2-82)

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: Adaptive management is a critical component of the LUPA/FEIS to which all future management decisions will be tied. The additional information inserted into the FEIS is based on newly developed and highly technical analyses procedures that have not been adequately reviewed or analyzed in the FEIS. The significant new information and technology has bearing on the proposed action and its effects. Because this constitutes a significant change from the draft and because the management responses tied to hitting a trigger (Table 2-9- PHMAs and Table 2-10- GHMAs) are very specific with serious economic impact potential and questionable biological benefits to sage-grouse from a limiting habitat perspective, the SEP recommends a supplemental EIS be issued in order to allow for public comment and review (40 CFR 1502.9(c)(4).

The SEP also recommends that the correct citation be included:
Coates, PS, BJ Halstead, EJ Blomberg, B Brussee, KB Howe, L Wiechman, J Tebbenkamp, KP Reese, SC Gardner, ML Casazza. 2014. A hierarchical integrated population model for greater sage-grouse (*Centrocercus urophasianus*) in the Bi-State Distinct Population Segment, California and Nevada: U.S. Geological Survey Open-File Report 2014-1165, 34p. doi: 10.3133/ofr20141165 [Open_File_Report]

Lockyer, Z., Coates, P., Casazza, M., Espinosa, S., & Delehanty, D. (2013). Greater Sage-grouse Nest Predators in the Virginia Mountains of Northwestern Nevada. Journal of Fish and Wildlife Management., 4(2):242-254.

Coates, P. S., and D. J. Delehanty. 2004. The effects of raven removal on sage-grouse nest success. Proceedings Vertebrate Pest Conference 21:17.

Coates, P., & Delehanty, D. (2010). Nest Predation of Greater Sage-grouse in Relation to Microhabitat Factors and Predators. Journal of Wildlife Management, 74:240-248.

Allowance of Other Unspecified Mitigation Systems

Statement of issue: The preferred alternative allows for the development and use of other applicable mitigation systems in addition to the Nevada Conservation Credit System (CCS). The SEP remains concerned with the lack of detail surrounding the process for creating other applicable mitigation systems and, more importantly, the lack of detail surrounding the level of rigor for these alternative systems. The SEP understands that there is a need to account for existing signed agreements (i.e. the Barrick Bank Enabling Agreement), as well as the need for flexibility in the unlikely event that the CCS is not able to fulfill mitigation requirements. However, the allowance of multiple mitigations systems, without specific detail requiring that alternative mitigation systems achieve at a minimum the same level of conservation gain, does not provide consistency or certainty for the Department of Interior, private industry, non-governmental conservation organizations, local governments, or the State, thus diminishing the ability to achieve and account for landscape level conservation gain. The USFS plan fails to mention the CCS.

Relevant part(s) of the plan amendment:
The SEP is pleased with the addition of multiple references in the BLM's plan to the use of the CCS based on CA review comments submitted. The areas still requiring stronger language are:

- Chapter 2, Section 2.6.2, Page 2-22, Action SSS 2
- Chapter 2, Section 2.6.2, Page 2-23, Action SSS 3
- Chapter 2, Section 2.6.2, Page 2-26, Action SSS 9a
- Chapter 2, Section 2.6.2, Page 2-49, Action UFM 3
- Chapter 2, Section 2.6.2, Page 2-51, Action LOC 4
- Chapter 2, Section 2.7.3, Page 2-91, Action MI 2

Similar language is completely absent from the USFS plan.

Previous comments submitted or discussed for the record: See attached. The SEP did not comment on this in the DEIS CA review process, as the language in the preferred alternative selected in the DEIS stated "Action D-SSS-AM 8: The BLM and Forest Service would coordinate with the Nevada Sagebrush Technical Team on the application of the Conservation Credit System (once it is established) for mitigation of activities that disturb GRSG habitat within Nevada where the application of the mitigation would occur on or the credit would be applied to disturbance on Public or National Forest Lands" (DEIS, page 100).

Statement of why the State Director's decision is believed to be wrong: The State of Nevada codified their commitment to the conservation of sagebrush ecosystems, in Nevada Revised Statutes (232.161, 232.162, 321.592, and 321.594) in 2013, with the creation of the Sagebrush Ecosystem Council (SEC), the SETT, and a mandate to create a mitigation banking system. After months of development through public meetings, technical and scientific review, and extensive consultation with Federal agencies, the SEC unanimously adopted the Nevada CCS during a two-day intensive public workshop in December 2014. The development and adoption of the CCS included extensive input from the USFWS, BLM, and USFS. The CCS is a rigorous, scientifically based mitigation program that includes measures for habitat suitability and availability to ensure net conservation gain for the greater sage-grouse. In addition, the CCS is a system that is transparent and consistently applied to credit and debit projects in each mitigation situation. Other mitigation systems considered should be equally rigorous and undergo an analysis to develop a crosswalk with the credits of the CCS to ensure net conservation gain for sage-grouse. This will provide to USFWS certainty and equitability of application per the Greater Sage-grouse Range-wide Mitigation Framework. Multiple mitigation banking systems that cannot be shown to be effective based on best available science create challenges when trying to quantify benefits across landscapes.

The FEIS fails to provide detail on the alternative mitigation systems or assurance that they incorporate the best available science. The CCS is a rigorous and vetted mitigation system created with input from the Technical Review Group comprised of leading scientific experts in Nevada. The CCS represents the best

available science, which BLM is required to use when making decisions as indicated in the BLM Land Use Planning Handbook H-1601-1 and the BLM NEPA Handbook H-1790-1.

According to 43 CFR 1610.3-1(d) and 43 CFR 1610.3-2(a) the BLM shall ensure that resource management plans are consistent with officially approved or adopted resource related plans of State governments; however the proposed action is inconsistent with the State Plan, specifically as it relates to the use of the CCS. The BLM has failed to follow 43 CFR 1610.3-1(d) by failing to identify where inconsistencies exist between the proposed action and the State Plan and "provide reasons why the inconsistencies exist and cannot be remedied." The State has provided written comments throughout the planning process detailing this inconsistency between the State Plan and the LUPA. The BLM has failed to document how these inconsistencies were addressed and, if possible, resolved as required under 43 CFR 1610.3-1(f) and FLPMA Sec 202(c) (9) (43 USC 1712).

The SEP requests the language in the FEIS be strengthened regarding the designation to use the Nevada CCS as the primary mitigation system (excluding existing signed agreements) and that the rigor of the CCS is set as the bar that other systems must meet to ensure that they are equitable and comparable. SEP requests that the USFS include similar language in their plan to give deference for the use of the Nevada CCS. SEP requests that a member of the SETT be the State representative on the applicable WAFWA Management Zone Teams described in Appendix I.

BLM and USFS Habitat Objectives/Desired Conditions

Statement of issue: There are inconsistencies between BLM's Habitat Objectives Table (Table 2-2) and USFS Desired Conditions Tables (Tables 2-5 and 2-6). Each table is also inconsistent with Nevada's Desired Habitat Conditions Table (Table 4-1) in the State Plan. The proposed management actions in the preferred alternative that are tied to the tables (2-2, 2-5, 2-6) fail to use the best available science to establish management actions. This is also a significant change from the DEIS, which contained only one Habitat Objectives Table for both agencies (DEIS Table 2-6).

Within the USFS proposed plan, the Seasonal Habitat Desired Conditions identified in Tables 2-5 and 2-6 are notably different for ecoregion 341 (Intermountain semi-desert and desert) and ecoregion 342 (Intermountain semi-desert). Although the intent of having two tables is to provide more site specific information relative to different site potential, the tables are inconsistent in the habitat indicators used as well as the conditions described, thus resulting in inconsistency issues within the same agency.

The habitat objectives and desired seasonal habitat conditions were based on select biological research that described seasonal habitat needs for GRSG. However, the proposed habitat indicators do not consistently incorporate allowance for variability in ecological state and phases, i.e. site potential. Describing one set of narrow conditions as the universal standard against which all landscapes and all land uses are to be evaluated is inappropriate and inconsistent with the best available science of range ecology and management, and is inconsistent with the Nevada Range Monitoring Handbook (Swanson, et al. 2006) which the BLM and USFS have adopted in Nevada.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.6.2; Table 2-2; pg 2-18 to 2-19
- Chapter 2; Section 2.6.2; Greater Sage-grouse; Objective SSS1; pg 2-17
- Chapter 2; Section 2.6.2; Vegetation Management; Objective VEG 3; pg 2-27
- Chapter 2; Section 2.6.2; Vegetation Management; Action VEG 2; pg 2-27
- Chapter 2; Section 2.6.2; Vegetation Management; Action VEG 6 vii, viii, ix; pg 2-28
- Chapter 2; Section 2.6.2; Vegetation Management; Action VEG 7; pg 2-28
- Chapter 2; Section 2.6.2; Vegetation Management; Objective VEG-RH 1; pg 2-31
- Chapter 2; Section 2.6.2; Vegetation Management; Objective VEG-RH 3; pg 2-32
- Chapter 2; Section 2.6.2; Wildfire Management; Action WFM-HFM 13; pg 2-37

- Chapter 2; Section 2.6.3; Table 2-5 and Table 2-6; pg 2-57 to 2-60.

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: One of the regulatory mechanism deficiencies identified by the USFWS in their 2010 finding was a lack of consistency in the way that habitat conditions were compiled, interpreted, and established. This factor was a primary impetus for initiating the plan amendment process. Different proposed plans and associated management actions for BLM and USFS do not meet the purpose and need for the LUPA to develop consistent range-wide conservation objectives and to inform the collective conservation efforts of all partners in response to the USFWS March 2010 "warranted, but precluded" ESA finding (40 CFR 1502.13). These differences could lead to inconsistent management and conservation outcomes between BLM and USFS managed lands.

Further, the proposed new Tables 2-2, 2-5, and 2-6 add information relevant to the environmental concerns and has bearing on the proposed action and its effects (40 CFR 1502.9(c)(l)(iii) which justifies a supplemental EIS.(BLM NEPA Handbook H-1790-1).

Actions in the proposed plan require management to "meet, restore, reestablish, and achieve" the narrowly focused habitat objectives. However, in many instances these objectives cannot be met by management actions alone. For example, desired sagebrush height and cover cannot realistically be achieved solely through management actions due to other factors such as climate, topography, and site specific conditions. Changes in livestock management will not restore herbaceous understory in brush-dominated areas if the understory is depauperate. Forb abundance and diversity are extremely variable between sites and between years and are predominantly influenced by winter and spring climatic conditions not by management practices. These tables set unachievable objectives, which may not be met without significant restoration inputs due to site specific ecological and physiological processes. Setting unachievable objectives is inconsistent with The Nevada Rangeland Monitoring Handbook (Swanson 2006) officially adopted by the BLM and USFS in Nevada, which details setting "SMART" objectives, which require them to be achievable. Management driven by unachievable objectives is inconsistent with existing policy.

The FLPMA, and its implementing regulations, require that BLM's land use plans be consistent with officially-approved state and local plans. The State Plan is consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands; therefore, Section 4 with table 4-1 should be fully incorporated into the FEIS.

The SEP recommends that BLM and USFS incorporate the introductory language (text of Section 4.0) and the desired habitat conditions (Table 4-1) from the State Plan. Language in the State Plan points out that vegetation community response to management techniques can be highly variable and may take years to reach desired conditions, if that transition pathway is even possible. Management actions must focus on maintaining or trending toward objectives based on ecological site potential and state and transition models.

Sagebrush Focal Areas (SFAs)

Issue #1 – Statement of issue: The methods provided for delineation of the SFAs are not explicit and therefore not transparent nor scientifically defensible. First, the section on page 2-2 to 2-3 describes the general characteristics considered when delineating the focal areas, but does not provide methods or the "scientific tools" used in their development. Then, the Nevada Management Categories (Coates et al. 2014) and the NDOW Habitat Categorization methods are both referenced, but prioritization in these tools do not line up with the delineation of the SFAs. Finally, the paragraph on page 2-11 refers the reader to the USFWS letter dated October 27, 2014. This letter provides more detail as to the input layers considered in the development of the SFAs; however again, an explicit method is not clearly outlined. In

reviewing the input layers in this letter (Doherty et al 2010, Knick and Hanser 2011, Chambers et al. 2014, ownership boundaries), the SEP did not come to a consistent delineation with the SFAs. Overall, the criteria described for producing SFAs does not match the State's assessment of breeding bird densities (per Doherty et al. 2010) or resistance and resilience mapping statewide (Chambers et al. 2014), and it is unclear what criteria were applied to determine which landscapes qualify as being "essential to conservation and persistence of the species."

The most recent analysis of populations at the Management Zone level (Garton and Connelly 2015) found the Southern Great Basin Management Zone (SGBMZ) to be one of the most stable populations range-wide with a zero percent likelihood of reaching a critically low level of 200 or fewer males in the next 30 years. This is Nevada's most stable population, yet this population did not make it into the SFA. Conversely, this and other Nevada specific data were not included in the delineation of SFAs for Nevada, nor were any experts in the State consulted in the creation of these boundaries.

Also, the delineation of SFAs constitutes a major change from the DEIS to the FEIS which did not allow time to review methodology or suggest changes via a comment period.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2-1; page 2-2 to 2-3
- Chapter 2; Section 2.6.2; page 2-25, Action SSS 5

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: The BLM Land Use Planning Handbook H-1601-1 and the BLM NEPA Handbook H1790-1 requires the use of best available science. The process for delineation of SFAs needs to be clearly defined and understandable to incorporate the best available science especially new science specific to populations in Nevada, and for duplication using the same tools. The delineation of SFAs also constitutes significant new information in the FEIS which justifies a supplemental EIS to provide time for meaningful public review and comment in compliance with NEPA 40 CFR 1502.9(c)4.

We request the BLM and USFS do not use the SFA delineations. If SFAs are determined to be necessary, the BLM and USFS need to revisit the methods of delineation and provide more robust quantitative methods in the FEIS via a supplemental EIS to allow for meaningful review and comment. We also request that the State be involved in this process.

Doherty, K.E., J.D. Tack, J.S. Evans, and D.E. Naugle. 2010. Mapping breeding densities of greater sage-grouse: A tool for range-wide conservation planning. BLM Completion Report. Interagency Agreement # LIOPG00911.

Chambers, J.C.; D. A. Pyke, J.D. Maestas, M. Pellant, C.S. Boyd, S.B. Campbell, S. Espinosa, D.W. Havlina, K.E. Mayer, and A. Wuenschel. 2014b. Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach. Gen. Tech. Rep. RMRS-GTR-326. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 73p.

Garton, E., and J. Connelly. 2015. Greater sage-grouse population dynamics and probability of persistence. Pew Charitable Trusts.

Knick, S.T., and S.E. Hanser. 2011. Connecting pattern and process in greater sage-grouse populations and sagebrush landscapes. Pp. 383 - 405 in S.T. Knick and J.W. Connelly (editors). Greater Sage- Grouse: ecology and conservation of a landscape species and its habitats. Studies in Avian Biology (vol. 38), University of California Press, Berkeley, CA.

Issue #2 – Statement of issue: Applying the SFA concept primarily to the Northern Great Basin Management Zone (NGBMZ) may undervalue the importance of conserving habitats in the Southern Great Basin Management Zone (SGBMZ) and other non-SFA landscapes by shifting management priorities (e.g., vegetation management, grazing permit renewals) away from habitats of high importance

for Nevada and the species range-wide. This could result in unintended consequences for Nevada's GRSG populations and their habitat statewide.

Based on the work of Chambers et al. (2014), which is incorporated and referenced, throughout the FEIS, much of the SFA encompasses higher resistance and resilience areas of the planning region. This means, should disturbance occur in these areas they are more likely to recover on their own. Following the prioritization of Chamber et al. 2014, more proactive management actions (e.g., fire operations, vegetation management,) should be occurring in less resistant and resilient landscapes (See Table 4 in Chambers et al. 2014). Prioritizing management and conservation actions in some form is a very good approach for focusing conservation gains across very large landscapes; however, the delineation of the SFAs did not appropriately incorporate scientific tools such as concepts of resistance and resilience to be the main focus of prioritization for management actions. Deficient use of resistance and resilience ecology as the best available science for SFA delineation is inconsistent with other parts of the LUPA.

Relevant part(s) of the plan amendment

- Chapter 2; Section 2.6.2; pg 2-2 to 2-3
- Chapter 2; Section 2.6.2; Action SSS 5; Page 2-25
- Chapter 2; Section 2.6.2; Action WFM 2; Page 2-33
- Chapter 2; Section 2.6.2; Action LG 2, Action LG 4; Page 2-39
- Chapter 2; Section 2.6.2; Action LG 11; Page 2-42
- Chapter 2; Section 2.6.2; Action WHB 3; Page 2-43
- Chapter 2; Section 2.6.2; Action WHB 4; Page 2-44

(NOTE: The USFS did not provide actions that define prioritization for management actions in SFAs).

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: The BLM Land Use Planning Handbook 1601-1 and the BLM NEPA Handbook 1790-1 require the use of best available science. Prioritizing management actions based on the SFA spatial delineation which does not incorporate science specific to GRSG populations in Nevada and the Chambers et al (2014) work on resistance and resilience, as well as other available science violates BLM policy and could be detrimental to population numbers in Nevada and across the range. The delineation of SFAs also constitutes a significant change from the DEIS to the FEIS which warrants a supplemental to provide time for meaningful review and comment.

The SEP recommends that management action priorities should be analyzed and defined using science-based tools, e.g., resistance and resilience concepts described in Chambers et al. (2014) in PHMA, then GHMA, then OHMA.

Chambers, J.C.; D. A. Pyke, J.D. Maestas, M. Pellant, C.S. Boyd, S.B. Campbell, S. Espinosa, D.W. Havlina, K.E. Mayer, and A. Wuenschel. 2014b. Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach. Gen. Tech. Rep. RMRS-GTR-326. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 73p.

Exclusion Areas

Statement of issue: The SEP protests actions which restrict or exclude certain land use allocations without specific analysis of how the one-size-fits-all action accomplishes sage-grouse conservation. Our concern relates to the following actions:

- Fluid Minerals Development – Designating SFAs and PHMAs as open to fluid mineral leasing subject to No Surface Occupancy (NSO) without waiver, modification, or exception;
- Wind Energy Development – Designating ROW exclusion areas in PHMAs SFAs;
- Solar Energy Development – Designating PHMAs and GHMAs as solar energy ROW exclusion areas;

- Locatable Minerals Mining – Recommended mineral withdrawal in SFAs under the General Mining Law of 1872, as amended;
- Nonenergy Leasable Minerals Mining – Designating PHMAs as closed areas;
- Salable Minerals Mining – Designating PHMAs and SFAs as closed areas;
- Recreation – No new recreation facilities in PHMAs and SFAs on BLM lands and PHMAs, GHMAs, and SFAs on USFS lands.

Relevant part(s) of the plan amendment:
Fluid Minerals Development
- Chapter 2; Section 2.6.2; pg 2-25, Action SSS-5
- Chapter 2; Section 2.6.2; pg 2-48, Action UFM 2 and Action UFM 3
- Chapter 2; Section 2.6.3; pg 2-71 GRSG-M-FMUL-ST-091-Standard, and pg 2-72 GRSG-M-FMUL-ST-093-Standard

Wind Energy Development
- Chapter 2; Section 2.6.2; pg 2-45; Action LR-WD-1
- Chapter 2; Section 2.6.3; pg 2-63; GRSG-WS-ST-027-Standard

Solar Energy Development
- Chapter 2; Section 2.6.2; pg 2-45; Action LR-IS-1
- Chapter 2; Section 2.6.3; pg 2-63; GRSG-WS-ST-026-Standard

Locatable Minerals Mining
- Chapter 2; Section 2.6.2; pg 2-25; Action SSS-5
- Chapter 2; Section 2.6.2; pg 2-45; Action LR-LW 1
- Chapter 2; Section 2.6.2; pg 2-50; Action LOC-2

Nonenergy Leasable Minerals Mining
- Chapter 2; sec 2.6.2; pg 2-51; Action NEL 2

Salable Minerals Mining
- Chapter 2; sec 2.6.2; pg 2-51; Action SAL 2
- Chapter 2; sec 2.6.3; GRSG-M-MM-ST-115-Standard

Recreation
- Chapter 2; sec 2.6.2; pg 2-54; Action REC 3
- Chapter 2; sec 2.6.3; pg 2-70; GRSG-R-GL-078-Guideline

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: Exclusion of these land uses over vast expanses of public lands violates the definition of "multiple use" as defined in FLPMA Sec 103 (c) (43 USC 1702) and fails to take into account "the long-term needs of future generations for renewable and non-renewable resources." Where there are competing resource uses and values in the same area, Section 103(c) of FLPMA (43 USC 1702) requires that the BLM manage the public lands and their various resource values so that they are utilized in the combination that will best meet multiple use and sustained yield mandates. Similar provisions are provided under the National Forest Management Act (16 U.S.C. 1600) for multiple-use management of Forest Service lands.

These actions are in direct conflict and inconsistent with the Plan, inconsistent with best science, and inconsistent with the threats and objectives identified in the Conservation Objectives Team (COT) report. The State Plan does not identify exclusion zones, but instead provides an "avoid, minimize, mitigate" process to address impacts to achieve net conservation gain from anthropogenic disturbances (pages 12 – 18, 61 – 66, 69 – 70, State Plan). The State contends that the proposed land use allocations are not needed if the "avoid, minimize, mitigate" process is adhered to, including the complete adoption of the Conservation Credit System which assures a net conservation gain.

According to 43 CFR 1610.3-1 (d) and 43 CFR 1610.3-2 (a) the BLM shall ensure that resource management plans are consistent with officially approved or adopted resource related plans of State governments, however the LUPA is inconsistent with the State Plan. The BLM has failed to follow 43 CFR 1610.3-1 (d) by failing to identify where inconsistencies exist between the LUPA and State Plan and "provide reasons why the inconsistencies exist and cannot be remedied." Furthermore, though the State has provided written comments throughout the planning process detailing the inconsistencies between the State Plan and the LUPA, the BLM has failed to document how these inconsistencies were addressed and, if possible, resolved as required under 43 CFR 1610.3-1 (f) and FLPMA Sec 202 (c) (9) (43 USC 1712).

Further, the BLM and FS have not provided scientific information that supports the assumptions in the analysis of environment consequences leading to the unsubstantiated conclusion that exclusion actions are effective for GRSG conservation. The effects analysis assumes that exclusion of surface disturbance will provide a high level of protection for sagebrush ecosystems. The extent of habitat disturbance due to anthropogenic actions, such as mineral and energy development, is minimal compared to habitat loss due to wildland fire and invasive species. However, the proposed action does not improve resiliency or other ecologic functions or reduce the threat of wildfire. The analysis of environmental consequences is flawed and does not comply with NEPA 40 CFR 1500.4 (c), 40 CFR 1500.4(g), 40 CFR 1500.5(d), 40CFR 1502.16 (BLM NEPA Handbook H-1790-1).

Three Percent Disturbance Cap

Statement of issue: The SEP protests implementation of the Disturbance Management Protocol (DMP), which creates an anthropogenic disturbance cap of three percent of PHMA within a Biologically Significant Unit (BSU) and proposed project analysis area. A disturbance cap is inconsistent with the State Plan, inconsistent with best science, does not adequately address the threats identified in the Conservation Objectives Report (COT), and will interfere in the effective implementation of the Conservation Credit System. The CCS is based on best science and does adequately address all of the threats identified in the the COT report. The SEC reviewed the concepts surrounding disturbance caps at length and found them not to be beneficial for sage-grouse in Nevada.

The SEP appreciates the Nevada-specific disturbance management protocol allowing for a team of experts to determine if the cap can be exceeded in areas where a biological analysis indicates a net conservation gain to the species. The team of experts in the FEIS includes NDOW, the USFWS, and the BLM. It is unclear how the USFWS has authority to have a "veto" as considered in the current FEIS language, as Greater Sage-grouse are not a listed species and are the management responsibility of the Nevada Department of Wildlife and the State of Nevada. A member of the SETT should also be included. Moreover, the DCNR Director should be included in the process if the team does not agree, as SETT is a program within DCNR.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.6.2; pg 2-20, Action SSS 2
- Chapter 2; Section 2.6.3; pg 2-60; GRSG-GEN-ST-004-Standard
- Appendix F

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: These actions are in direct conflict and inconsistent with the State Plan. The State Plan does not include disturbance caps, but instead provides an "avoid, minimize, mitigate" process to address impacts from anthropogenic disturbances (pages 12 – 18, 61 – 66, 69 – 70, State Plan). The additional disturbance cap restriction is not needed due to the "avoid, minimize, mitigate" process, including the complete adoption of the Conservation Credit System.

According to 43 CFR 1610.3-1(d) and 43 CFR 1610.3-2(a) the BLM shall ensure that resource management plans are consistent with officially approved or adopted resource related plans of State governments, however the LUPAs are inconsistent with the State Plan. The BLM has failed to follow 43 CFR 1610.3-1(d) by not identifying where inconsistencies exist between the LUPA and State Plan and "provide reasons why the inconsistencies exist and cannot be remedied." Furthermore, though the State has provided written comments throughout the planning process detailing the inconsistencies between the State Plan and the LUPAs, the BLM has failed to document how these inconsistencies were addressed and, if possible, resolved as required under 43 CFR 1610.3-1(f) and FLPMA Sec 202 (c)(9) (43 USC 1712).

The disturbance cap also violates the definition of "multiple use" as defined in FLPMA Sec 103(c) (43 USC 1702) and fails to take into account "the long-term needs of future generations for renewable and non-renewable resources." Where there are competing resource uses and values in the same area, Section 103(c) of FLPMA (43 USC. 1702) requires that the BLM manage the public lands and resource values so that they are utilized in the combination that will best meet multiple use and sustained yield mandates. Similar provisions are provided under NFMA (16 USC 1600) for multiple-use management of Forest Service lands.

The disturbance cap fails to account for the quality of habitat and seasonal habitat types, which should be considered based on best available science. A disturbance cap is not a useful management tool given Nevada's spatial distribution of seasonal habitats. In many instances greater than three percent disturbance in winter habitat, where winter habitat is the majority of the landscape within a BSU, would not have a negative impact on populations, whereas less than three percent disturbance on limited brood rearing habitat could have a detrimental impact. A disturbance cap does not adequately address the importance of limiting habitat types in Nevada. The Conservation Credit System (CCS) in the State Plan more adequately accounts for this by:

- consistently defining habitat quality including site, local, and landscape quality for both impacts from development (debits) and benefits from enhancement and protection (credits) using functional acres as the common unit of measure, accounting for both direct and indirect effects of anthropogenic disturbances, and
- rigorously addressing limiting habitat needs within a given project effects' area.

The three percent limit of total discrete anthropogenic disturbances in BSAs regardless of ownership is not realistic and, again, ignores spatial distribution of habitats and private property rights. If existing disturbance is clustered in one part of the BSA, additional adjacent disturbance may have no effect on GRSG. However, relocation of disturbances to BSAs with less than three percent disturbance could have large impacts to GRSG. The one-size-fits-all approach does not assure greater conservation for sage-grouse and does not allow for adaptive management in a dynamic biological system. The environmental consequences and indirect impacts for the proposed three percent disturbance cap have not been adequately analyzed and is not compliant with NEPA, 40 CFR 1502.16, 40 CFR 1502.1 (BLM NEPA Handbook H-1790-1).

The SEP recommends using the rigor of the CCS program rather than a three percent disturbance cap. If the disturbance cap remains, despite the State's protest, we request language in the FEIS that the cap be a temporary backstop to give time for the CCS to prove its effectiveness. When the CCS is proven to be effective the disturbance cap would no longer be required. We also request the SETT be on the technical team of experts when deciding if the cap can be exceeded and the DCNR Director should be included on the executive team if the decision is not unanimous.

In addition, while disturbance caps were included in Alternatives B and F of the DEIS, the DMP was not. The protocol is highly technical and has far reaching implications. This constitutes a significant change from the DEIS to the FEIS, which warrants a supplemental EIS in order to allow for sufficient public review and comment (40 CFR 1502.9(c)(4).

Livestock Grazing

Issue #1 - Statement of issue: The level of specificity proposed in the livestock grazing actions LG 1, LG 3, LG 5, LG 6, and LG 18 is more appropriately addressed at the activity planning level as an Allotment Management Plan (AMP) rather than in the LUPA. An AMP should be prepared in careful and considered consultation, cooperation, and coordination with affected permittees, the resource advisory council, and the interested public (43 USC 1753(a); 43 CFR 4100 Sec 4120.2). The AMP includes terms and conditions to comply with standards and guidelines; prescribes the livestock grazing practices necessary to meet specific resource objectives; specifies the limits of flexibility to be determined and granted on the basis of the operator's demonstrated stewardship; and specifies monitoring to evaluate the effectiveness of management actions in achieving the specific resource objectives of the plan (43 CFR Sec. 4100 Part 4120.2).

The management strategies mandated in LG 1, LG 3, LG 5, and LG 6, that are used as standardized responses when conditions are not meeting or making progress toward meeting land health standards, do not incorporate cooperative planning mandated by FLPMA. FLPMA endorses permittee involvement and innovative problem solving to develop solutions that meet resource objectives. Cookbook implementation of standardized practices will, in some cases, lead to reduction or elimination of grazing use without fixing habitat or rangeland health problems or using the GRSG desired habitat conditions to identify optimum achievable resource objectives. The GRSG desired habitat objectives are not applicable to direct management actions.

Terminating grazing in the middle of the permitted grazing season, Action LG5, based on localized exceedance of utilization standards will cause substantial uncertainty for livestock producers and is inconsistent with the Taylor Grazing Act (43 USC 315), which is purposed at stabilizing the public land livestock industry. This kind of uncertainty has, in many cases, prevented investment in management infrastructure needed for effective management and has contributed to the sale and subdivision of ranches. Furthermore, triggers and end-point indicators are tools to be applied within an allotment management plan in consideration of additional actions to meet resource objectives Swanson et al. (2006). The indirect impacts of increased use of important habitats on private land meadows as a result of preempting the grazing season have not been analyzed.

The unintended consequences of potentially ineffective management actions may result in unnecessary elimination of grazing use on public lands and the subsequent loss of important sage-grouse habitat on private lands. This has not been analyzed as required by NEPA.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.6.2; Livestock Grazing; Action LG-1; pg 2-39
- Chapter 2; Section 2.6.2; Livestock Grazing; Action LG-3; pg 2-39
- Chapter 2; Section 2.6.2; Livestock Grazing; Action LG-5; pg 2-40
- Chapter 2; Section 2.6.2; Livestock Grazing; Action LG-6; pg 2-41
- Chapter 2; Section 2.6.2; Livestock Grazing; Action LG-18; pg 2-42.
- Chapter 2; Proposed Action and Alternatives – 2.12 Summary of Environmental Consequences Table 2-17. P. 2-466

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: Proposed actions LG 1, LG 3, LG 5, and LG 6 are inappropriate at the RMP planning level. 43 CFR Part 4100 §1601 defines the RMP as a land use plan that identifies allowable resource uses, resource condition goals and objectives to be attained, and program level constraints and *general* management practices needed to achieve them. Details of range management practices and permit terms and conditions are not intended at the RMP level. The RMP is not a final implementation decision on actions which require further specific plans or decisions under specific provision of other laws and regulations (e.g. FLPMA and Taylor Grazing Act).

Options for management responses should be applied at the appropriate planning level through development of AMPs. The list of management strategies proposed in LG 1, LG 3, LG 5 and LG 6 is far short of all solutions, or even the more useful tools, available through proper range management to address site-specific concerns. There is no evidence that the actions proposed will cure the failure to meet land health standards. These lists of management practices should be qualified as a non-exhaustive list of options to be considered at the AMP level. Proper range management citations should be provided to guide land managers to the best available science.

Neither the direct or indirect impacts of LG 1, LG 3, LG 5, or LG 6 have been adequately analyzed in compliance with NEPA and have not been shown to be consistent with the purpose and need of the LUPAs. The direct effects of the proposed actions do not implement proper livestock grazing practices to maintain ecological functions or to promote the healthy perennial grass and herbaceous vegetation component of a resilient plant community. The direct effects of the utilization levels proposed in LG 5 and LG 6 have not been shown to be effective in meeting or moving toward desired habitat objectives. [The Holechek 1988 citation is outdated and has been superseded by Holechek et al. 2011 for guidance on range management. The Platts 1990 manuscript was primarily written for riverine riparian systems that support fisheries which are generally different than the kind of meadows used by GRSG for late brood rearing. It has been superseded by TR-1737-20 (Wyman et al. 2006), which will soon be updated by Swanson, Wyman, and Evans (accepted).]

The analyses of the environmental consequences to Vegetation and Soils (Table 2-17) Proposed Action is incorrect. It states, "Limited disturbance due to restricting permitted actions would lead to improved vegetation conditions....Increased emphasis on incorporation of GRSG habitat objectives and considerations into programs such as livestock grazing, recreation, and wild horse and burro management would likely lead to improvements in overall vegetation conditions." Science does not support this conclusion and the flawed analysis violates NEPA. Current range science would incorporate management based on ecological site descriptions, existing ecological state, and apply management to target desired phases within that state to avoid pathways (such as fire) that cross thresholds to new states (Caudle, et al. 2013). The impacts of the proposed action to vegetation and soils could have adverse effects on maintaining resilient sagebrush communities, increasing rangeland fuel load, and exacerbating wildland fire behavior.

The FEIS should consider greater incorporation of the Livestock Grazing section in the State Plan.

Issue #2 - Statement of issue: The FEIS lacks pertinent citations on livestock grazing management as related to the functionality and sustainability of sagebrush/perennial herbaceous plant communities and meadows within the sagebrush ecosystem. Regarding the first point, repeated statements throughout the document infer or directly indicate that grazing can have adverse impacts on herbaceous vegetation and, by implication, sage-grouse. The use of livestock as a tool for meadow enhancement is documented in literature, but essentially ignored or mentioned without appropriate citations. Studies by Neel (1980), Klebenow (1982), and Evans (1986), and included in Beck and Mitchell (2000) demonstrated that cattle grazing can be used to stimulate forb production. These studies were all conducted in Nevada, focusing on livestock use of upland meadows frequented by sage-grouse in late brood rearing.

Davies et al. (2011, p. 2575) concluded based on literature review that "Though appropriately managed grazing is critical to protecting the sagebrush ecosystem, livestock grazing per se is not a stressor threatening the sustainability of the ecosystem. Thus, cessation of livestock grazing will not conserve the sagebrush ecosystem." Davies et al. (2009 and 2010) also found that long-term rest increases the likelihood of fire-induced mortality of perennial bunchgrasses because more fuel resides on the root crown of perennial bunchgrasses and that post-fire exotic annual grass invasion was greater in sagebrush plant communities where livestock grazing had been excluded for more than half a century compared to moderately grazed areas. Davies et al. (2015) found that winter grazing effectively reduces summer fuel moisture, amount, and continuity, and fire season length.

Knopf (1996) found that season of grazing is more important than intensity of grazing. Late-season grazing on dormant vegetation has little effect on bird communities Knopf (1996). Johnson et al. (2011) showed that moderate and low stocking rates of cattle grazing on bunchgrass communities in northeastern Oregon caused no negative impacts to ground-nesting songbirds. These stocking rates generally provided suitable habitat for all species studied and results were similar to the no grazing treatment. Whitehurst and Marlow (2013) – In mountain big sagebrush habitat, higher forb nutrient density that is critical for pre-incubating sage-grouse hens and survival of young broods can be achieved with targeted cattle grazing and selective thinning of mature mountain big sagebrush stands. Laycock (1967) found that fall grazing (with sheep) and grazing exclusion resulted in a 30 percent increase in production of perennial grasses and perennial forbs compared to spring use. In this case, a change in the timing of grazing had the same effect as the long-term exclusion of grazing.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.6.2; Livestock Grazing; pg 2-38 to 2-43
- Chapter 2; Section 2.6.3; Livestock Grazing; pg 2-65 to 2-67
- Chapter 4 Environmental Consequences

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: The science used in the FEIS is incomplete. The literature summarized above and additional citations were provided in detailed comments from the SEP to the DEIS. The FEIS violates the NEPA requirement for the use of best available science (40 CFR 1502.1).

The SEP is requesting that the management actions be revised to reflect best available science from multiple disciplines, specifically to include range ecology.

Issue #3 - Statement of issue: The FEIS fails to adequately analyze the socio-economic impacts from the proposed action. The economic effects analysis was not conducted in collaboration with the SETT as a cooperating agency (43 CFR Part 4100 §1610.4-6) and does not give adequate consideration to economic factors in compliance with NEPA 40 CFR 1508.14 (BLM NEPA Handbook BLM Handbook of Socio-Economic Mitigation, IV-2).

Socio-economic impacts to counties and local communities, where impacts will be most relevant, have not been disclosed. The proposed actions will require significant infrastructure and added operating expenses for livestock operators (fencing, water developments, livestock gathers, etc.). The indirect effects of the proposed action could result in a significant reduction or elimination of grazing, and the subsequent sale and subdivision of ranches. The FEIS does not provide adequate information to determine the costs and economic impacts of these actions.

Relevant part(s) of the plan amendment:

- Chapter 4; Environmental Consequences; 4.21.2 Economic Impacts from Management Actions Affecting Grazing Allotments. P.4-407 – 4-414

Previous comments submitted or discussed for the record: See attached.

Statement of why the State Director's decision is believed to be wrong: NEPA requires the impact on local economies be analyzed. A supplemental EIS is needed to document the details of the economic analysis in a transparent manner that allows for public comment.

Beck, J. L., & Mitchell, D. L. (2000). Influences of livestock grazing on sage- grouse habitat. Wildlife Society Bulletin, 28(4), 993-1002.

Caudle, D., J. DiBenedetto, M. Karl, H. Sanchez, and C. Talbot. 2013. Interagency Ecological Site Handbook for Rangelands. (Interagency publication BLM, NRCS, and USFS)109 pp. http://jornada.nmsu.edu/files/InteragencyEcolSiteHandbook.pdf

Davies, K. W., J. D. Bates, T. J. Svejcar, and C. S. Boyd. 2010. Effects of long-term livestock grazing on fuel characteristics in rangelands: an example from the sagebrush steppe. Rangeland Ecology & Management 63:662–669.

Davies, K. W., C. S. Boyd, J. L. Beck, J. D. Bates, T. J. Svejcar, and M. A. Gregg. 2011. Saving the sagebrush sea: an ecosystem conservation plan for big sagebrush plant communities. Biological Conservation 144:2573–2584.

Davies, K. W., T. J. Svejcar, and J. D. Bates. 2009. Interaction of historical and nonhistorical disturbances maintains native plant communities. Ecological Applications 19:1536–1545.

Davies, Kirk W., Chad S. Boyd, Jon D. Bates and April Hulet. 2015. Dormant season grazing may decrease wildfire probability by increasing fuel moisture and reducing fuel amount and continuity. International Journal of Wildland Fire.

Evans, C. C. 1986. The relationship of cattle grazing to sage grouse use of meadow habitat on the Sheldon National Wildlife Refuge. M. S. Thesis, University of NV, Reno. 199 p.

Johnson, T. N., P. L. Kennedy, T. DelCurto, and R. V. Taylor.2011. Bird community responses to cattle stocking rates in a Pacific Northwest bunchgrass prairie. Agriculture, Ecosystems, and Environment 144: 338-346.

Klebenow, D.A. 1982. Livestock grazing interactions with sage grouse. Pages 113-123 in: J.M. Peek and P.D. Dalke, editors. Proceedings of the Wildlife-livestock Symposium, 20-22 April 1981, Coeur d'Alene, Idaho. Proceeding 10, University of Idaho Forestry, Wildlife, and Range Experiment Station, Moscow, ID.

Knopf, F. L. 996. Perspectives on grazing nongame bird habitats. Pages 51–59 in: P.R. Krausman, editor. Rangeland Wildlife. Denver (CO): Society for Range Management.

Laycock. 1967. How heavy grazing and protection affect sagebrush-grass ranges. Journal of Range Management 20: 206-213.

Neel, L. A. 1980. Sage grouse response to grazing management in Nevada. M. S. Thesis, University of Nevada, Reno, NV.

Swanson, Sherman (Editor in Chief), Ben Bruce, Rex Cleary, Bill Dragt, Gary Brackley, Gene Fults, James Linebaugh, Gary McCuin, Valerie Metscher, Barry Perryman, Paul Tueller, Diane Weaver, and Duane Wilson. 2006. Nevada Rangeland Monitoring Handbook Second Edition. University of Nevada Reno Cooperative Extension Educational Bulletin-06-03 81 pp. http://www.unce.unr.edu/publications/files/ag/2006/eb0603.pdf

Whitehurst, W., and C. Marlow. 2013. Forb nutrient density for sage grouse broods in mountain big sagebrush communities, Montana. Rangelands 35:18-25.

Wyman, S., D. Bailey, M. Borman, S. Cote, J. Eisner, W. Elmore, B. Leinard, S. Leonard, F. Reed, S. Swanson, L. Van Riper, T. Westfall, R. Wiley, and A. Winward. 2006. Riparian area management: Grazing management processes and strategies for riparian-wetland areas. Technical Reference 1737-20. BLM/ST/ST-06/002+1737. U.S. Department of the Interior, Bureau of Land Management, National Science and Technology Center, Denver, CO. 105 pp. http://www.blm.gov/or/programs/nrst/files/Final%20TR%201737-20.pdf

Map Update Process

Statement of issue: The SEP protests that updating future sage-grouse habitat maps may have to occur through the land use plan amendment process.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.7.1; Action AM-1; Page 2-85

Previous comments submitted or discussed for the record:
The process for updating sage-grouse habitat maps in the DEIS, Draft Proposed Plan Amendment (CA Version), and Preliminary Proposed FEIS (CA Version) was different than what was is proposed in the current FEIS, therefore the SEP has not previously been provided an opportunity to comment on this item.

Statement of why the State Director's decision is believed to be wrong: The BLM and USFS are required to use the best available science when making decisions as indicated in the BLM Land Use Planning Handbook H-1601-1 and the BLM NEPA Handbook H-1790-1. The current proposal to update future maps through the land use plan amendment process violates the policy mandate of using the best available science for land use decisions. Appendix A of the LUPA/ FEIS states, "the updated map underwent peer review and is considered by the State, USGS, and the BLM as the best available science." The land use plan amendment process is lengthy and at times infrequent due to staff and monetary

resource constraints. This will result in BLM and USFS not using the best available science as the USGS habitat suitability model is updated, which will result in out of date maps that will not provide for the most appropriate management for sage-grouse. Specifically, a map update from the USGS will be available in August 2015, so by the time the ROD is signed it will not contain the most up to date information and best available science for sage-grouse habitat maps, and therefore will be in violation of NEPA and BLM policy.

The possibility for future map revisions to have to go through additional land use plan amendments is inconsistent with the policies and analyses in the LUPA/FEIS, specifically Appendix A. Appendix A outlines the BLM/USFS rational for use of an updated map in the FEIS, that was developed using different modeling methods than those in the DEIS, without need for a Supplemental EIS and additional public input. If the BLM/USFS analysis found that a change in maps using entirely different modeling methods between Draft and Final did "not result in new decisions or environmental effects that were not considered and disclosed in the Draft LUPA/EIS," then this logic should be extended to further refining and updating the map based on the same modeling methods as those in the FEIS, without the need to trigger a land use plan amendment. This conclusion was drawn on the assertion that "the Draft LUPA/EIS Alternative D analyzed all unmapped habitat," so this analysis should be adequate for future map updates that occur after the FEIS. Therefore, by using the BLM/USFS' own analysis conclusions so eloquently laid out in Appendix A, the land use plan amendment process is not necessary for future map updates.

According to 43 CFR 1610.3-1(d) and 43 CFR 1610.3-2(a) the BLM shall ensure that resource management plans are consistent with officially approved or adopted resource related plans of State governments; however the LUPA is inconsistent with the State Plan, specifically as it relates to the map updating process. The BLM has failed to follow 43 CFR 1610.3-1(d) by failing to identify where inconsistencies exist between the LUPA and State Plan and "provide reasons why the inconsistencies exist and cannot be remedied." The State has provided written comments throughout the planning process detailing this inconsistency between the State Plan and the LUPA. The BLM has failed to document how these inconsistencies were addressed and, if possible, resolved as required under 43 CFR 1610.3-1(f) and FLPMA Sec 202 (c) (9) (43 USC 1712).

The SEP proposes that the BLM/USFS use the process that was outlined in Appendix O of the Preliminary Proposed FEIS (CA Version) for future map updates. This process provides for the same framework and methods as were used to develop the maps in the FEIS and specifically indicates that updates to the maps using these methods will be incorporated through plan maintenance.

No mitigation requirement in OHMAs or mitigation requirement for indirect impacts to PHMA and GHMA as a result of disturbances occurring in OHMAs.

Statement of issue: The FEIS does not require mitigation in Other Habitat Management Areas (OHMAs). It also does not require mitigation for indirect effects that impact PHMA or GHMA habitats due to by disturbances occurring in OHMAs. The State's Conservation Credit System (CCS) takes both into consideration.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.6.2; Action SSS-4; page 2-25

Previous comments submitted or discussed for the record:

This was not in the DEIS, therefore the SEP has not previously been provided an opportunity to comment on this item.

Statement of why the State Director's decision is believed to be wrong: The State Plan requires mitigation for anthropogenic disturbances in OHMAs (the State Plan terminology for OHMAs is General Management Areas (GMAs)). This consideration requires the assessment for mitigation needs within an additional 7,620,000 acres of important sage grouse habitats that have been determined by the best available science (Coates et al. 2014) to be moderately suitable habitat for sage-grouse in areas of

estimated low space use. These areas are spatially important to sage-grouse as they maintain connectivity throughout the range in the sub-region and thus require analysis for appropriate mitigation through the CCS.

Moreover, the BLM and USFS adopted the habitat modeling methods described in Coates et al. 2014. These methods have been peer reviewed and published in a USGS open file report. These methods represent the best available scientific information. The BLM and USFS are failing to use the best available scientific information in their decisions as required by BLM Land Use Plan Handbook 1601-1 and BLM NEPA Handbook 1790-1 by arbitrarily choosing to exclude the use of portions of the modeling product.

The State Plan Conservation Credit System (CCS) takes into consideration the direct and indirect impacts that occur due to anthropogenic disturbances within all Sage Grouse Management Areas (SGMA) that affect habitats within the PHMA, GHMA, and OHMA. In administering mitigation, the CCS also considers the indirect effects outside the actual footprint of an anthropogenic disturbance that may impact habitats that are in other management areas.

According to 43 CFR 1610.3-1(d) and 43 CFR 1610.3-2(a) the BLM shall ensure that resource management plans are consistent with officially approved or adopted resource related plans of State governments, however the LUPA is inconsistent with the State Plan. The BLM has failed to follow 43 CFR 1610.3-1(d) by failing to identify where inconsistencies exist between the LUPA and State Plan and "provide reasons why the inconsistencies exist and cannot be remedied." Furthermore, though the State has provided written comments throughout the planning process detailing the inconsistencies between the State Plan and the LUPA, the BLM has failed to document how these inconsistencies were addressed and, if possible, resolved as required under 43 CFR 1610.3-1(f) and FLPMA Sec 202(c) (9) (43 USC 1712).

The SEP is requesting the BLM and USFS adopt mitigation requirements in the OHMAs for both direct impacts on OHMAs and indirect impacts in PHMA and GHMA created by anthropogenic disturbances occurring in OHMAs. This inclusion will protect additional sage-grouse habitat and offer greater assurances that the concept of "net gain" to the habitats will be achieved.

Travel and Transportation Management

Issue or issues being protested: The SEP protests the proposed actions of seasonal or permanent road closures and restrictions on the construction of new roads without coordination with state and county governments who have jurisdiction and maintenance responsibility over state routes and county roads.

Relevant part(s) of the plan amendment:

- Chapter 2; Sectoin 2.6.2; Action LR-LUA 19; pg 2-47
- Chapter 2; Section 2.6.2; Action CTTM 1 (specifically how seasonal restrictions specified in Action SSS-2 and Action SSS-3 will be applied to roads); pg 2-52
- Chapter 2; Section 2.6.2; Action CTTM 3, bullets 4, 5, 6, 7, and 9; pg 2-53
- Chapter 2; Section 2.6.2; Action CTTM 6; pg 2-54
- Chapter 2; Section 2.6.3; GRSG-RT-ST-081-Standard; pg 2-70
- Chapter 2; Section 2.6.3; GRSG-RT-ST-089-Standard; pg 2-70

Previous comments submitted or discussed for the record: See attachment

Statement of why the State Director's decision is believed to be wrong: Management of roads is under the jurisdiction of the State and local governments; therefore, the BLM and FS do not have the authority to close or restrict access to existing roads or restrict the construction of new roads. See Nevada Revised Statute (N.R.S.) 405.191 (public roads include what are commonly referred to as R.S. 2477 rights-of-way); N.R.S. 405.201 (accessory roads are roads to which public use and enjoyment may be

established). The proposed actions will restrict or eliminate access to roads which are founded upon existing and valid rights.

In addition, many of the actions listed above require clarification. It is unclear whether the actions refer to BLM and FS roads only or include State and local government roads with ROWs on federal lands. It is also unclear if these actions intend to restrict all motorized vehicles, including automobiles, or other motorized vehicles, such as OHVs and ATVs.

Wild Horse and Burro

Statement of issue: BLM acknowledges that ecosystems of public rangelands are not able to withstand the impacts from overpopulated herds of wild horses. Current herd number estimates of free-roaming wild horse populations exceeds by more than 22,500 the number that the BLM has determined can exist in balance with other public rangeland resources and uses. The 1971 Wild Free-Roaming Horses and Burros Act, as amended, Section 1333 mandates that once the Interior Secretary "determines...on the basis of all information currently available to him, that an overpopulation exists on a given area of the public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels." http://www.blm.gov/wo/st/en/prog/whbprogram/herd_management.html.)

Proposed action WHB 2 says BLM will manage herd management areas (HMA) in GRSG habitat to achieve rangeland health standards and trend toward or maintain GRSG habitat objectives in Table 2-2. BLM does not specify the kind of management needed to achieve the objective, or relate the management to the appropriate management level (AML). The BLM currently does not maintain AML across most HMAs in the sub-region. In Fiscal Year 2014 only 1.8 percent ($1.2 million) of the Wild Horse and Burro Program appropriation was spent on gathers and removals.

Relevant part(s) of the plan amendment:

- Chapter 2; Section 2.6.2; Action WHB 2; pg 2-43

Previous comments submitted or discussed for the record: See attached.

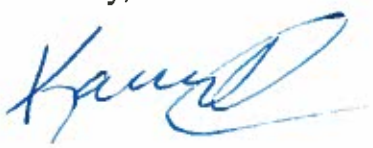
Statement of why the State Director's decision is believed to be wrong: AML was not established with consideration of the habitat objectives in Table 2-2. The proposed action WHB 2 implies that the BLM can manage and control wild horses to meet standards for rangeland health, achieve desired habitat objectives, and manage public lands in compliance with the Wild Free-Roaming Horses and Burros Act. Based on BLM's policy and track record, proposed action WHB 2 is not plausible, does not meet the purpose and need of the RMP amendment to "reduce, eliminate, or minimize threats to GRSG habitat" and therefore is non-compliant with NEPA (BLM NEPA Handbook H-1790-1). The inability to accomplish the proposed action leaves the BLM vulnerable to litigation. Action WHB 2 should be modified to include actions on how the BLM can successfully manage to AML or otherwise manage wild horses to minimize or eliminate risks to GRSG.

In conclusion, according to 43 CFR 1610.3-1 (d) and 43 CFR 1610.3-2 (a) the BLM shall ensure that resource management plans are consistent with officially approved or adopted resource related plans of State governments, however the LUPA is inconsistent with the State Plan. The BLM has failed to follow 43 CFR 1610.3-1 (d) by not identifying where inconsistencies exist between the LUPA and State Plan and "provide reasons why the inconsistencies exist and cannot be remedied." The State has provided written comments throughout the planning process detailing these inconsistencies between the State Plan and the LUPA. The BLM has failed to document how these inconsistencies were addressed and, if possible, resolved as required under 43 CFR 1610.3-1 (f) and FLPMA Sec 202 (c) (9) (43 USC 1712).

To reiterate, the State Plan is consistent with the purposes, policies, and programs of federal laws and regulations applicable to the public lands, is based on the best available data and science, addresses each of the threats identified by the Conservation Objectives Team (COT) report, was developed entirely in a public and transparent process, and is supported by a wide array of stakeholders across the State of Nevada. The State Plan as represented in the State's Alternative (Alternative E), in its entirety, should be used as the preferred alternative.

Thank you for your consideration of this protest of the Nevada and Northeastern California Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement (FEIS) on behalf of the Sagebrush Ecosystem Program.

Sincerely,



Kacey KC, Program Manager
Sagebrush Ecosystem Technical Team

Attachments: Comments Proposed Goals/Objectives/Management Actions (Alternative D)
Comments Administrative Draft LUPA and EIS
Comments Draft LUPA and EIS
Comments Proposed Plan (Alternative G)
Comments on Preliminary Proposed LUPA/Final EIS

cc: The Honorable Brian Sandoval, Governor
JJ Goicoechea, Chair, Local Government Representative- SEC
Chris MacKenzie, Vice-Chair, Board of Wildlife Representative- SEC
Allen Biaggi, Mining Representative- SEC
Steve Boies, Ranching Representative- SEC
Gerry Emm, Tribal Nations Representative- SEC
Starla Lacy, Energy Representative- SEC
Bevan Lister, Agriculture Representative- SEC
Tina Nappe, Conservation and Environmental Representative- SEC
Sherm Swanson, General Public Representative- SEC
Bill Dunkelberger, Forest Supervisor USFS, Ex-officio-SEC
Mary Grimm, Region 8 Listing Program Coordinator USFWS, Ex-Officio-SEC
John Ruhs, Acting State Director BLM, Ex-Officio-SEC
Jim Barbee, Director Nevada Department of Agriculture, Ex-Officio-SEC
Leo Drozdoff, Director Nevada Department of Conservation & Natural Resources, Ex-Officio-SEC
Tony Wasley, Director Nevada Department of Wildlife, Ex-officio-SEC

Greater Sage-Grouse CA/NV Sub-regional Review

To Cooperating Agency: Please review the proposed Goals/Objectives/ Management Actions for the CA/NV sub-regional alternative (Alternative D). Please provide your comments on the attached Comment Matrix.

How to Provide Valuable Feedback

Commenting:
For each comment, please fill in information under the appropriate column heading in the comment matrix.

- ✓ **Your comments should be specific.** Please be unambiguous, clear, and direct, with exact wording changes stated. Ambiguous comments, such as "What?" "Poor" or "Is this right?" are not helpful and will not be considered. If there is a better way to state something or provide more clarity in direction, provide the new language for consideration.
- ✓ Feel free to insert more rows if needed.
- ✓ Please focus on content; we are still conducting editorial reviews internally.

Specific Guidance

Focus your review and comments in response to the following questions:

1. Are the goals/objectives/management actions in Alternative D clear?

2. Are there additional goals/objectives/ management actions that should be included in Alternative D?

3. What Management Action can be taken to address climate change?

.

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT Date: May 8, 2013

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
1.	Global			Within each threat or resource category, goals, objectives, and management actions should be organized so that specific objectives are listed for specific goals, and specific management actions are listed for specific objectives. Right now under many of the threats, all management actions are listed together and it is not clear to which objective they apply. As well, there should be at least one management action per objective to show how that objective will be met. For example, under wildlife, there are 6 objectives listed and only 4 management actions listed, and actually all 4 of these actions apply to Objective 3, which leaves the remaining five objectives with no specific action as to how they will be met.
2.	Global			To increase clarity of goals, objectives, and management actions, the same order of threats/resources should be use between the presentation of Alternative D on page 1- 23 and the order in which the alternatives are presented in Table 2-2. For example, under Alternative D, Wildlife and Vegetation Management are the first two topics presented. However, in Table 2-2, part of Wildlife is presented first (but it is not labeled as such), then Lands and Realty are presented second. As well, the category names and groupings that are used are not the same on pages 1-23 as Table 2-2. This makes it very confusing. The category names should be the same throughout and presented in the same order. For example, is Integrated Vegetation Management (pg 2) the same as Integrated Invasive Species Management (pg 21 of Table 2-2)? Similarly, to increase clarity of goals, objectives, and management actions, parallel sentence construction for each of these should be implemented, especially when items are listed sequentially. For example, under Vegetation Management, Objectives 5 and 6, for Objective 5 it *starts* with "Within priority and general habitat" whereas Objective 6 *ends* with "in priority and general habitat". For all objectives that apply within priority and general habitat, the sentence should start as such. With this clearly stated at the beginning each time, the reader will know to which habitats the statement applies. A proper use of parallel construction between sentences is under Wildlife- Management Actions WL-3 and WL-4.
3.	Global			There are no goals, objectives, or management actions for energy production, transmission, and distribution. Consult the 2012 Nevada Plan for recommendations.
4.	Global			Several acronyms are used throughout the document without reference to the term or phrase. This could be addressed by including an acronym glossary in the DEIS.
5.	1	Wildlife	Objective 1	It would make sense to include the objectives for general habitat in this objective as well. Objectives for general habitat are not presented until Objective 6. Neither priority nor general habitat is defined.

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT Date: May 8, 2013

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
6.	1	Wildlife	Objective 1	Consider changing the word "anthropogenic" to "human". Save the technical /academic language for the technical reports or technical parts of the document. There will be great interest in this document by the general public and business communities. Use of jargon/technical language when not necessary will add to the distrust many folks in Nevada have for federal land managing agencies.
7.	1	Wildlife	Objective 1	There are no management actions that support this objective. These need to be developed.
8.	1	Wildlife	Objective 2	What is included in the concept of "no net unmitigated loss"? Does this include acts of God, e.g. fire and invasives, or does it only account for man-made impacts, i.e. mining activities?
9.	1	Wildlife	Objective 2	There are no management actions that support this objective. There need to be specific actions to state how loss will be mitigated and it needs to be clarified loss from what (fire, mining, lands sales, etc).
10.	1	Wildlife	Objective 3	This objective brings in the concept of seasonal use habitats (versus priority and general habitats), which is not clearly stated. The differences between these two habitat concepts should be defined either here or in a different section of the EIS. Objective should read, "Manage land resource uses to meet sage-grouse *seasonal use* habitat objectives…."
11.	1	Wildlife	Objective 4	It is unclear what specific "conservation measures" will be employed to minimize anthropogenic disturbances. The objective should read, "Eliminate or minimize discrete anthropogenic disturbances.". The management actions would then be specific conservation measure to meet such an objective. These specific actions need to be developed.
12.	1	Wildlife	Objective 4	Define the term "discrete anthropogenic disturbances". Elaborate here parenthetically or provide them in table.
13.	1	Wildlife	Objective 5	This objective should actually be a management action to meet Objective 1. Regardless, more detail is needed on how priority and general habitat will be defined. The definitions of each of these will play a crucial role in the effectiveness of the LUPs and thus USFWS's evaluation of effectiveness of the LUPs.
14.	1	Wildlife	Objective 6	How is "occupied" habitat being defined? The rest of the document refers to priority and general habitat. The document should be more consistent if management decisions are to be based off of habitat categories. In addition, there are no definitions for general and priority habitat.
15.	1	Wildlife	Objective 6	There are no management actions that support this objective. These need to be developed.
16.	1	Wildlife	Goal, and objectives	A definition of priority and general habitats for greater sage-grouse would be of great assistance in the review of this document and would serve to sharpen management actions associated with the objectives. Priority and general habitats are mentioned throughout the document but are not defined beyond a reference to table 2-3, which does not provide concise definitions and reference seasonal use which is different from priority/general.

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT Date: May 8, 2013

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
17.	2	Integrated Vegetation Management	Goal	A definition of a resilient sagebrush vegetative community from BLM's standpoint would be appropriate. Consider adding one to the EIS in a glossary or addendum.
18.	2	Integrated Vegetation Management	Objective 1	Clarify what managing for "site potential" entails.
19.	2	Integrated Vegetation Management	Objective 2	The "identified risk factors" need to actually be identified, or the citation for that information needs to be presented. Without that, this objective is not clear. It is unclear if the "identified risk factors at the subpopulation and population scale" are the same as the major threats listed in the "purpose and need" section of this document. Consider clarification of this matter in the review EIS.
20.	2	Integrated Vegetation Management	Objective 3	It is unclear what is meant by the terms "appropriate" and "important" in this context. How are these terms being defined? Are there any guidelines and standards being used to determine what are "appropriate" sagebrush species and "important" understory plants or it at the discretion of the land manager? Also, why are shrubs other than sagebrush not included?
21.	2	Integrated Vegetation Management	Objective 4	This objective is not measurable. The "patterns which most benefit sage-grouse" need to be defined so one can determine if they are met. If a management action is going to help determine what is most beneficial, then reference the management action.
22.	2	Integrated Vegetation Management	Objective 5	This objective is not measurable. "to maintain a component of…"- a component of could be just a very small amount not actually beneficial to sage grouse. "to promote adjacent cover" - how would one determine if this objective has been met?
23.	2	Integrated Vegetation Management		There are 25 management actions; however it is not clear to which of the 6 objectives each of these management actions applies. Management actions should be presented under specific objectives so it is easier to evaluate if objectives have detailed actions to ensure they are met.
24.	2	Integrated Vegetation Management	IVM-1	Is this action in response to habitat loss or is this for research purposes? Unclear as to what this is for or when these actions would be needed.
25.	3	Integrated Vegetation Management	IVM-2	Consideration of soil or bed material for existing seed viability?
26.	3	Integrated Vegetation Management	IVM-3	What exactly is the term "during project" referring to?

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT **Date: May 8, 2013**

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
27.	3	Integrated Vegetation Management	IVM-4	A list of Integrated Vegetation Mgmt. techniques would be useful to the reviewer. Consider adding this list to the DEIS as an addendum.
28.	3	Integrated Vegetation Management	IVM-5	Inclusion of medusahead?
29.	3	Integrated Vegetation Management	IVM-6	Why is nesting habitat the priority for restoration? Is it known to be the limiting factor for all sage grouse populations? What about areas of wyomingensis which is often wintering habitat?
30.	3	Integrated Vegetation Management	IVM-6	Is the habitat being referenced at the end of the first sentence, "…regardless of habitat designation", referencing priority/general designation or seasonal use designation (Table 2-3)?
31.	3	Integrated Vegetation Management	IVM-6	Bullet 1 - Restore to what? Not clear.
32.	3	Integrated Vegetation Management	IVM-6	Will this consider existing permitted uses?
33.	4	Integrated Vegetation Management	IVM-9	Second sentence should be clarified with, "….non-native seeds may be used as long as they support sage grouse habitat objectives *and have as a high a probability of success as native seeds*."
34.	4	Integrated Vegetation Management	IVM-12	What is the science supporting this objective?
35.	4	Integrated Vegetation Management	IVM-14	How long is long-term?
36.	4	Integrated Vegetation Management	IVM-15	Unclear on the 'Emphasis' of winter ranges.
37.	4	Integrated Vegetation Management	IVM-16	Recommend BLM provide an addendum list of approved IVM techniques used in managing sage-grouse habitat.
38.	5	Integrated Vegetation Management	IVM-17	This says basically the same thing as Objective 5 under Vegetation Management. It needs to be clarified how these are different (ie how is IVM-17 going to accomplish Objective 5?).

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT Date: May 8, 2013

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
39.	5	Integrated Vegetation Management	IVM-17	Consider mentioning livestock grazing in this management action.
40.	5	Integrated Vegetation Management	IVM-21	Should PFC also be considered here?
41.	5	Integrated Vegetation Management	IVM-22	First bullet - How are you determining the "most limiting habitat component"?
42.	5	Vegetation Management	IVM - 22	Second bullet- Statement is not clear. Maybe it should read: "Reestablish sagebrush within identified seasonal use areas that have been degraded or affected by wildfire"?
43.	5	Integrated Vegetation Management	IVM-22	Third bullet- There is concern for excessive manipulation in areas where cheatgrass is already established (manipulation may just allow for cheatgrass to expand). Clarification should be provided on how that concept fits in with this management action.
44.	5	Integrated Vegetation Management	IVM-22	Bullets 1-3 - Should additional shrub types be considered?
45.	5	Vegetation Management	IVM - 22	Seventh bullet point. Suggest adding the following language to the end of the sentence: "to avoid invasive or undesirable vegetation establishment".
46.	6	Integrated Vegetation Management	IVM-22	Eighth bullet - How are you defining "appropriate treatment method(s)? Again, are there guidelines and standards being used or is left up to the discretion of the land manager?
47.	6	Integrated Vegetation Management	IVM-23	Regardless of state or stage?
48.	6	Integrated Vegetation Management	IVM-24	Should other invasive or noxious weeds be considered for treatment?
49.	6	Fire/ Fuels/ Invasive Spp Mngmt	Goal 1	For additional clarity, consider the use of the phrase "pre/post suppression" inserted between "Fire" and "fuels management…"
50.	6	Fires, Fuels, Invasives	Goal 3	Fix the wording in Goal #3 maybe transpose the words "would and efforts"
51.	7	Fire Management		While there are several pre-suppression management actions identified on Page 7, there does not seem to be any objectives identified for pre-suppression activities.

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT Date: May 8, 2013

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
52.	7	Fire Management	Objectives 2-4	These objectives almost seem more like goal statements rather than objectives. To some degree, objectives should answer the question of "how much, by when".
53.	7	Fire/ Fuels/ Invasive Spp Mngmt	Objective 6	For additional clarity, consider inserting the phrase "and green strips" between "…seeded fuel breaks" and "protecting native vegetation."
54.	7	Fire Management	Objective 7	This objective seems more like a management action.
55.	7	Fire Management	Add as a Management Action to Objective 7	One of the objectives within this section should be to increase the availability of resources for fire suppression activities to include privately owned and appropriately certified equipment that could be contracted out. An appurtenant management action would be to develop partnerships with private construction companies, mines and ranches to have heavy equipment available and transported quickly to incidents as they arise.
56.	8	Fire Management	WFS-2	This isn't a very specific management action until the last sentence, which should be worded as such: "Local agency administrators, resource advisors and ***state agency wildlife biologists*** would convey…."
57.	9	Fire/ Fuels/ Invasive Spp Mngmt	HFM-4	Do you really mean that no fuels treatment project would be implemented in priority and general habitat if it is determined to "not be beneficial to sage-grouse or its habitat" or do you mean if it is determined to be "negative" to sage-grouse or its habitat? In the case of the former, would a fuels treatment project not be allowed if it would have a neutral impact?
58.	10	Invasive Spp & Conifer Encr	ISCE-1	Is grazing considered a mechanical or biological method?
59.	10	Invasive Spp & Conifer Encr	ISCE-4	What is considered "feasible"?
60.	11	Invasive Spp & Conifer Encr	ISCE-7	In the first sentence under this management action, "Phase II and Phase III pinyon and juniper…" are not defined. Please provide a definition in the DEIS.
61.	11	Invasive Spp & Conifer Encr		Mapping should be included and coordinated with state weed mapping effort.
62.	11	Comp Travel and Trasp Mngmt		While it can be inferred from the actions listed below, it is not explicit that NDOT would not have to realign one of its facilities in an effort to enhance habitat. NDOT would like to see it stated somewhere that existing right-of-way easements granted for Title 23 purposes not be considered SG habitat and not be considered for enhancing as SG habitat and would not need to be relocated under any management action.
63.	11	Comp Travel and Trasp Mngmt	Goal	It is unclear how the term "reasonable" is being defined. This definition may vary greatly person to person.
64.	12	Comp Travel and Trasp Mngmt	CTTM-3	To clarify, the creation new of new roads is not allowed and cannot mitigated for? The wording is a bit unclear and want to point out that this how it was interpreted.

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT **Date: May 8, 2013**

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
65.	12	Comp Travel and Trasp Mngmt	CTTM 4	Several points in the 2010 listing decision indicated that regulatory mechanisms were inadequate because they were addressed "on a case-by-case basis". More details should be provided to indicate the framework in which these decisions will be made to show there are some consistent guidelines being followed.
66.	12	Comp Travel and Trasp Mngmt	CTTM-6	Use of the word obliterate is unclear.
67.	12	Comp Travel and Trasp Mngmt	CTTM 6 and 7	These two management actions appear to be the same, though 7 is more detailed. Either they need to be reworded to show why they are different, or just 7 should be retained.
68.	14	Rangeland Management - Livestock	Objectives 2 and 3	Would be beneficial to reference Table 2-4 after each of these objectives.
69.	15	Livestock Grazing	LG-3	It should be determined if livestock grazing is the reason the sage grouse objectives are not being met in an allotment. If it is not, then adjusting the permit would likely still not achieve objectives. This needs to be clarified.
70.	15	Livestock Grazing	LG-4	Would this retirement be permanent or be reinstituted once the allotment met sage-grouse habitat objectives?
71.	15	Livestock Grazing	LG-5	Please include a description of 'emergency management measures'.
72.	15	Livestock Grazing	LG-6	Terms and conditions language does not already exist? Is it needed?
73.	15	Livestock Grazing	LG-7	What is considered "livestock concentration"?
74.	16	Livestock Grazing	LG-10 and 12	These two management actions appear to be the same, though 12 is more detailed. Either they need to be reworded to show why they are different, or just 12 should be retained.
75.	16	Livestock Grazing	LG-14	Second sentence. Fires do not give advance notice. Closures due to veg treatments post fire need to be allowed without prior decision making on permits.
76.	16	Livestock Grazing	LG-14	Could managed grazing be considered if treatment objectives are not met and invasive species control is the objective?
77.	16	Wild Horse and Burro	WHB-1	The word "prevent" in this sentence should be removed.
78.	18	Locatable Minerals	Objective 1	How can this objective allow for the minimization of net loss to priority habitat when previously stated goals provide for no net unmitigated loss of priority habitat? This is inconsistent with the rest of the document. Objective should read: "Authorize Plans of Operation per 43 CFR 3809 regulations that result in ***no net unmitigated loss of priority habitat***".
79.	18	Locatable Minerals	Objective 2	Refer to previous comment regarding the term "reasonable".
80.	18	Locatable Minerals	LM-1	Last part of sentence beginning with "that" should read: "***results in no net unmitigated loss of priority habitat"***.

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT **Date: May 8, 2013**

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
81.	18	Non-Energy Leasable		There are no goals or objectives stated.
82.	19	Saleable Minerals	SM-3	This indicates sales are allowed in "general habitat as required". Are sales in "priority habitat as required" allowed? This is not clear. This is also inconsistent with SM-1 which allows for no new sales in priority and general habitat.
83.	19	Saleable Minerals	SM-3	Clarify if mitigation is required in priority habitat. Right now it is just stated for general habitat.
84.	19	Saleable Minerals	SM-6	Wording is unclear if this is just priority habitat or if this was supposed to say priority and general habitat.
85.	20	Climate Change	Objectives	Add an objective, possibly to become Objective 1 that states "Focus management efforts to maintain, enhance or restore native perennial grass and forb communities within sagebrush ecosystems to promote resiliency".
86.	20	Other Management	CC-3	Suggest defining Phase 2 and Phase 1 Pinyon-Juniper in a glossary or addendum
87.	21	Climate Change	CC-4	The management action focuses on "treatment" possibly to match the stated Objective 1; however, there are many things that can be achieved through passive management techniques (e.g. improved livestock grazing practices and wild horse management) that would promote resiliency and ameliorate the effects of climate change.
88.	21	Climate Change	Add Management Action CC-6	As climate change data become available through Rapid Ecoregional Assessments or other ecological studies, build resiliency into restoration and enhancement seed mixes to ensure high value habitat persistence in light of anticipated climate change effects.
89.	22	Standard Surface Use	Goal?	Goals and objectives need to be developed for this.
90.	22	Predation	Add Management Action P-3	Add the following management action: Eliminate existing raven nesting opportunities created by anthropogenic development on public lands (eg. Remove powerline and communication facilities no longer in service)
91.	23	Opportunities	OFPM-2	It would be more appropriate to be more specific here. I suggest the following: "Consider developing a Conservation Planning Tool that is informed by a resource selection function and utilization distribution analyses (via knowledge gained from radio-marked or GPS/Satellite marked grouse) to help prioritize habitat conservation actions"
92.	23	Opportunities	OFPM-5	Areas within general habitat that are utilized as mitigation should have reasonable potential to achieve vegetation objectives and meet the needs of sage-grouse depending on season of use. It would be worthwhile to build this concept into the management action.
93.				
94.				

COMMENT MATRIX
NE CA-NEVADA SUB-REGIONAL ALTERNATIVE D

Cooperating Agency: State of Nevada - DCNR, NDOW, NDOT **Date: May 8, 2013**

Cmt #	Page #	Resource Program	Goal/Objective/ Management Action	Comment
95.				
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STATE OF NEVADA
Sagebrush Ecosystem Program

July 1, 2013

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William Dunkelberger, Forest Supervisor
Humboldt-Toiyabe National Forest
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RE: Nevada and Northeast California Sub-regional Greater Sage-Grouse Administrative Draft Land Use Plan (LUP) Amendment and Environmental Impact Statement (EIS)

Dear Ms. Lueders and Mr. Dunkelberger,

The State of Nevada appreciates the opportunity to participate in the Cooperating Agency Review of the Administrative Draft of the above mentioned document. The State of Nevada is submitting one set of comments under the umbrella of the Sagebrush Ecosystem Technical Team (SETT). The SETT, on behalf of the Sagebrush Ecosystem Council (SEC), will be the lead on all greater sage-grouse issues for the State. These comments are a compilation of all State Cooperating Agencies, including: Department of Conservation and Natural Resources (DCNR), Nevada Department of Wildlife (NDOW), and Nevada Department of Transportation (NDOT).

The State looks forward to reviewing the BLM's preferred alternative when it becomes available during the public review of the DEIS. The State would like to reiterate that it is the desire of Governor Brian Sandoval, as recommended by his Greater Sage-Grouse Advisory Committee, for the State's Alternative (Alternative E) to be selected as the BLM's preferred alternative. The Governor's Advisory Committee represented an intense and unified broad stakeholder effort to produce a plan to protect the sage-grouse through a public and transparent process.

The State's sincere commitment to address the protection of the sage-grouse has been demonstrated through the formulation of the Greater Sage-Grouse Advisory Council, created by Executive Order (EO) # 2012-09, which drafted the 2012 Strategic Plan for Conservation of Greater-Grouse in Nevada (State Plan). The State Plan was approved by the Governor and later used to formulate the State's Alternative that was submitted to the BLM for inclusion in the DEIS. Central to the State Plan is the creation of the Sagebrush Ecosystem Program and the Mitigation Bank System, which Governor Sandoval recently signed into state law after the Nevada Legislature approved Assembly Bill (AB)

461. As the first state in the nation to enact such a law, this highlights the State's continued commitment to the conservation of sage-grouse into the future. This commitment represents an important statement to the US Fish and Wildlife Service (USFWS) that protection of the sage grouse will not be "business as usual" in Nevada .

After careful review of the ADEIS, the State is very concerned that the State Alternative has not been accurately represented or fairly analyzed. Major points at issue are:

- The ADEIS gives little credence to the multi-disciplinary, inter-agency SETT. The SETT is the central element of the State Plan. The SETT is already on the job and the program has been signed into state statute by AB 461. The ADEIS states that the SETT process, as endorsed by the Governor, is illegal as it is applied to jurisdiction on federal lands. The State counters that there is already precedent to allow for the BLM and US Forest Service (USFS) to coordinate with state agencies on federal lands in Nevada. The creation of an MOU could be one possible solution to address any concerns that the BLM and USFS may have. Since the SETT is central to the State's Alternative and represents a commitment to the USFWS to conduct business differently in the future to protect the sage-grouse, statements such as those referenced above and found throughout the ADEIS are of great concern.

- Little consideration is given to the Mitigation Bank proposal in the ADEIS. The conclusion of the ADEIS is that the Mitigation Bank Program is the "same as Alternative A". The Mitigation Bank System is anything but "no action" and provides a new and innovative regulatory mechanism for the USFWS to consider when making their listing decision. Again, since the Mitigation Bank System is central to the State's Alternative and represents a commitment to the USFWS to conduct business differently in the future to protect the sage-grouse, this is of great concern.

- The ADEIS is dismissive of the State's "avoid, minimize, mitigate" policy and equates it to "no action". During the months-long Governor's Advisory Committee process, there was specific direction given by the facilitators and federal agencies to emphasize the "avoid, minimize, mitigate" philosophy. The State's representatives accepted this direction in good faith and developed the 2012 State Plan that reflects that direction. Instead of designating development exclusion areas, this policy proposes a hierarchical decision process in which development would be avoided in sage-grouse habitat wherever possible. If development cannot be relocated, measures would be taken to minimize impacts to sage-grouse. Finally, after all practical measures have been taken; any adverse effects would be offset through the Mitigation Bank System. This would achieve the goal of no net unmitigated loss of sage-grouse habitat, which is the same goal in the BLM/USFS Alternative.

Specific and detailed comments are attached. The State respectfully requests the thoughtful and rational consideration of the issues and comments outlined in this letter and a revised analysis of the State's alternative prior to the public release of the DEIS.

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 myself or our lead staff person on this effort, Melissa Faigeles, at 775-684-8600, or email me directly at timrubald@sagebrusheco.nv.gov.

Sincerely,

Tim Rubald, Program Manager
Sagebrush Ecosystem Technical Team

c: Mr. Cory Hunt, Governor Sandoval's Office
Mr. Leo Drozdoff, Director DCNR
Mr. Tony Wasley, Director NDOW
Mr. Rudy Malfabon, Director NDOT
Mr. Jim Lawrence, Administrator Division of State Lands

CHAPTER 1-INTRODUCTION
COMMENT MATRIX

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT Date: 6/28/2013

Cmt #	Section	Line	Comment
1.		1-II ; Entire page	A portion of the acronym list is presented here but the list is incomplete. A reference to the complete list in Chapter 8 would be helpful
2.	1.7.4	1-25; 20	The title of this section is Endangered Species Recovery Plans yet many of the plans and species in this list are not classified as Endangered. It should be renamed as Fish and Wildlife Species Recovery or Management Plans
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Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT Date: 6/28/2013

Cmt #	Section	Line	Comment
1.	General		After careful review of the ADEIS, it has come to the State's attention that there is an error in the state's alternative located in the "Management Strategy in Occupied/ Suitable Habitat" section (page 2). The state did not intend to include this statement: "Limit habitat disturbance, including habitat improvement projects, in Occupied and Suitable Habitat to not more than five percent per year, per SGMA, unless habitat treatments show credible positive results (Connelly, et al. 2000). This limit does not apply to removal of invasive or encroaching vegetation where such removal actually creates habitat." The State respectfully requests removal of this policy from consideration prior to the public release of the DEIS. It is our intent that all other items in the alternative remain. In its place, please analyze the policy that appears in the State Alternative immediately after the aforementioned: "Manage to avoid surface disturbance and habitat alteration to the greatest extent possible. If avoidance is not possible, disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied Habitat will trigger habitat evaluations and consultation with the Nevada Sagebrush Ecosystem Technical Team (see PMA-2)." The state's comments all reflect this change.
2.	General		While acknowledging that NEPA documents are planning level documents, NDOT believes this document needs to better address potential impacts in this document instead of deferring them to the implementation level. Failure to address these issues in more detail at this point may result in the implementation of an alternative that places unanticipated or unexpected regulatory burdens upon future applicants.
3.	General		NDOT believes that identifying potential exemptions in this document is appropriate at this level and should not be addressed at an implementation-level. We would like to see any potential exemptions to the measures proposed in Alternatives B-F clearly identified. This approach would be useful to adequately weigh the efficacy of a given alternative and such an approach will greatly reduce any confusion at the implementation level at the District, Field Office, or Forest level.
4.	General		With more than 130 pages of table outlining the various alternatives and there applicability, at least several more pages could be dedicated to clearly illustrate any proposed exempt activities/situations per alternative. For example, Alternative E provides as a general note and as a specific measure (TMA 23.1) "On federal lands, activities that have an approved BLM notice, plan of operation, **right-of-way** (emphasis added), or drilling plan, and on State/Private lands, projects with an approved Nevada Division of Environmental Protection permit, are exempt from any new mitigation requirements above and beyond what has already been stipulated in the project's approvals." If no exemptions are planned for an alternative, then clearly note that for each alternative.

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Cmt #	Section	Line	Comment
5.	General		It is NDOT's position that **existing** NDOT right-of-way (including material sources) be considered unsuitable habitat for Greater Sage Grouse and be exempt from the management policies proposed in this document. Nevada's Interstates, United States Highways and State Routes are indispensible components of the National and State economies. Nevada's current network of NDOT and Federal Highway Administration (FHWA) administered roads also provides essential social cohesiveness to our greatly dispersed rural citizens. The timely maintenance and expansion of existing facilities is essential to the efficient operation of Nevada's transportation system while providing Nevadans and our visitors with a safe, efficient, and cost effective transportation network. NDOT and FHWA endeavor to protect Nevada's rich and diverse natural resources and wildlife and would work voluntarily with the land managing agencies to implement measures that would be beneficial to the Greater Sage Grouse within our existing right-of-way. Any expansions of right-of-way would be subject to the measures proposed in this document.
6.	General		In support of the goals and objectives of the alternatives proposed in this document and the preservation and protection of the GSGR, NDOT and FHWA support the use of highway right-of-way to co-locate utility, energy, and other facilities that may otherwise impact priority or general SGR habitat as long as it doesn't hinder the use of our existing right-of-way for transportation purposes or diminish the safety of our roadways.
7.	2.4.5	Pg 2-12; line 18	State of Nevada Alternative is Appendix C, not D
8.	2.4.5	Pg 2-12; lines 20-22	We disagree with the conclusion that Alt E would only apply to BLM and USFS lands in Nevada and not California.
9.	2.4.5	Pg 2-12; lines24-27	Which actions in Alt E would not be legally implementable on federal lands? The writers never refer back to this and identify the specific actions than are believed to be illegal. These should be identified and discussed in detail if in fact there are such actions that are "illegal".
10.	2.4.5	Pg 2-12; lines 14-36	The description of Alt E is incomplete and misleading to readers. There is much more to Alt E than just the SGMAs. We strongly encourage the BLM to rewrite the description to include the State's objective of no net loss of sage-grouse habitat through a policy of avoid, minimize, mitigate. A discussion of the Sagebrush Ecosystem Technical Team and Council as well as the mitigation credit system needs to be included. These are central to the State's alternative. Please refer to the 2012 Strategic Plan for Conservation of Greater Sage-Grouse in Nevada to specific language to rewrite the description, as well as AB461 of the 2013 legislative session whis is now state law.
11.	2.6.1	Pg 2-18; line 20	Remove the bracket after WAFWA
12.	2.6.4	p. 2-20; line 15	"Over" seems misplaced and needs to be removed.
13.	map	Alt D	Geothermal leasing Map- The difference in the colors is negligible. Please provide more contrasting colors

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Cmt #	Section	Line	Comment
14.	Table 2-3		Table 2-3 (pg 2-32) -Alt E does not designate PPH and PPG, but does include SGMAs with new habitat definitions of Occupied, Suitable, and Potential. Since these new categories are not mapped, the BLM used PPH and PPG in its place in the analysis. Since this approach was taken, the acreages of PPH and PPG should be included in this table. -We disagree with the "no similar action" categorization of Alt E for "Wild Horses and Burros". Please refer to TMA-11, TMA-11.1, and TMA-11 and revise accordingly. -Under "Comprehensive Travel and Transportation Management" for Alt E, in addition to Action: See Role of SETT, also include TMA-16 – 16.2 from Alt E. -Under "Lands and Realty" section, also include the following actions from Alt E: TMA-8.1 and TMA-18.4 -Under "Wind Energy Development" and "Utility-Scale Solar" include Action TMA18-18.13 from Alt E.
15.	Table 2-4	Page 2-69	We recommend inserting the bold and underlined language as cover within riparian areas influences how sage-grouse use these areas (Klebenow 1982). "Objective: Manage lentic and lotic riparian areas in priority and general habitat to maintain a component of perennial forbs with diverse species richness **and maintain suitable cover**; manage adjacent upland habitat to promote adjacent cover relative to site potential to facilitate brood rearing." Of course "suitable cover" should be defined (e.g. 4 inch stubble height). Klebenow, D. A. 1982. Livestock grazing interactions with sage grouse. P. 113-123 In Peek, J. M., and P. D. Dalke, Eds. 1~82. Wildlife-Livestock Relations Symposium: Proceedings 10. Univ. of Idaho, Forest, Wildlife, and Range Experiment Station, Moscow, Idaho.

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Cmt #	Section	Line	Comment
16.	Table 2-5		Remove times consisting of current management items that are common to all alternatives from Alternative E altogether. Consider discussing in "management common to all alternatives" section. For example, in Table 2-5 pages 2-79/80 it states: • "Conduct annual lek counts across most Population Management Units. Train volunteers who provide additional manpower in assisting with additional lek counts. Volunteers must be qualified by attending a day-long training session that includes actual field training each year. • Population demographic data is determined from the Sage- Grouse harvest. Hunters shall deposit one wing from each bird harvested in wing barrels located on primary hunting access roads, check stations, or to be delivered to a NDOW Field or Regional Office. Wings shall be separated by geographic locations (county or hunt area). Wings shall be used to identify sex, age, nest success, and number of chicks per hen. • Monitor harvest through the use of the 10% Hunter Questionnaire that randomly polls license holders and through the collection of Sage- Grouse wings from hunter harvested birds. • Regulate harvest by season length and bag limit as set forth by the Nevada Board of Wildlife Commissioners and, consulting recommendations made by the Nevada Department of Wildlife. • In areas that are closed to hunting, wing data are not available for monitoring population demographics such as the number of chicks per hen. For these areas, conduct brood counts along established routes. Brood surveys shall be conducted mid-summer when Sage-Grouse are concentrated on meadow habitats. Established brood count routes shall be surveyed to record average brood size and the number of chicks per hen." These actions are current management and should be included in "management common to all alternatives section.

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Cmt #	Section	Line	Comment
17.	Table 2-5	Page 2-100	Where in the literature has burning meadow edge to remove brush shown a positive impact on sage-grouse? I would urge caution regarding this management action. Removing the brush likely removes valuable cover. Removing the brush won't automatically change an upland site to a mesic site. Managers must first determine why brush encroachment is occurring. If brush encroachment is occurring because of down cutting, burning will remove sage-grouse cover with the site staying in upland condition.
18.	Table 2-5	Page 2-143	We recommend including the **bold and underlined language** "Action: No new recreation facilities would be constructed in priority and general habitat **unless neutral or beneficial effects to greater sagegrouse is the result** e.g. Campgrounds, day use areas, scenic pullouts, trailheads, etc." We do not wish to restrict all activities; rather we seek to ensure activities that are authorized have a net neutral or positive outcome.
19.	Table 2-5	Page 2-147	Altnerative D "Action: Where appropriate, bury new and existing utility lines as mitigation unless not feasible." Who determines if it is not feasible? What criteria is being used?
20.	Table 2-5	Page 2-162/3	Alternative D "When necessary, prioritize and conduct additional mitigation: • Within the same population area where the impact is realized. • Within the same WAFWA Management Zone as the impact. We recommend including "unless greater population benefits can be realized ouside the population area or WAFWA management zone, subject to BLM and State Wildlife agency consultation and agreement."
21.	Table 2-9		The State disagrees with many of the conclusions outlined for Alt E in Table 2-9, principally that Alt E would provide *fewer* benefits to sage-grouse and their habitat than Alt A "no action" and that proposed actions for many of the resource management areas would be the same as Alt A. Please refer to our comments for chapter 4 for greater detail. We believe that the writers lacked a thorough understanding of the State's Alternative and that the analysis was faulty and needs to be reconsidered.
22.	Table 2-9	Pg 1 line 8-13	The conclusion that Alt E would allow for more areas be available for livestock use is not correct. See comments on Section 4.3.8 p4-45 lines 29-30, lines 31-32, and lines 36-37. Once the section has been reevaluated, place proper synopsis in the table.
23.	Table 2-9	Pg 9 Fluid Minerals	The conclusion that impacts from Alt E would be the same as Alt A is not correct. See comments on Section 4.3.8 p4-46 line 11-13. Alt E should be listed as having less impact on sage-grouse due to fluid minerals compared to Alt A due to the implementation of the following strategies: avoid, minimize, mitigate policy; disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT; and implementation of the mitigation credit system.

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Cmt #	Section	Line	Comment
24.	Table 2-9	Pg 9 Locatable Minerals	The synopsis here does not actually reflect management strategies provided in Alt E. Alt E should be listed as having less impact on sage-grouse due to locatable minerals compared to Alt A due to the implementation of the following strategies: avoid, minimize, mitigate policy; disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT; encouraging a conservation ethic in the mining industry; and implementation of the mitigation credit system.
25.	Table 2-9	Pg 10 Salable Minerals	The conclusion that impacts from Alt E would be the same as Alt A is not correct. See comments on Section 4.3.8 p4-46 line 15. Alt E should be listed as having less impact on sage-grouse due to salable minerals compared to Alt A due to the implementation of the following strategies: avoid, minimize, mitigate policy; disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT; encouraging a conservation ethic in the mining industry; and implementation of the mitigation credit system.
26.			There are no objectives that address other habitats (i.e. non priority or general) that may be important to sage-grouse. For example, if a migratory sage-grouse population moves across a portion of land but doesn't use that piece of land, then it is likely NDOW's Habitat Category 4 and there are no protections. However, if the BLM or USFS permits a project such as Wind Energy Development on that migration piece of land, it could have negative impacts to sage-grouse. We recommend including a general "catch-all" objective that applies to non "priority" and non "general" habitat areas. For example stating something like "we acknowledge that areas not mapped as priority or general habitat may serve a critical role for sage-grouse survival and species persistence. Actions will not be permitted that could compromise this survival"
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CHAPTER 3-AFFECTED ENVIRONMENT
COMMENT MATRIX

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT Date: 6/28/2013

Cmt #	Section	Line	Comment
1.	3.2.1	Pg 3-6; lines 3-6	It would be beneficial to add the findings of Kolada et al. 2013 within this section because it discusses the importance of total shrub cover to nesting sage-grouse and is being supported by other research efforts in the region.
2.	3.2.1	Pg 3-7 line 23	Dispersal is generally at the individual, not population, level. Reword text in parentheses to be "(when an individual permanently moves to other areas)".
3.	3.2.1	Pg 3-7; lines 27-28	Pinyon and juniper encroachment need to be added to the list of factors contributing to habitat loss and fragmentation.
4.	3.2.1	Pg 3-8; lines8-9	This sentence discusses sagebrush recovery from fire and suggests that full recovery could take place within 15-30 years. This is likely possible for mountain big sagebrush, but is unlikely for Wyoming big sagebrush. Additional narrative here is warranted to clarify the differences between the two species in terms of re-establishment.
5.	3.2.1	Pg 3-9; lines 9-34	A better reference or at least one that should be included in this paragraph is the following: STIVER, S.J., E.T RINKES, AND D.E. NAUGLE. 2010. Sage-grouse Habitat Assessment Framework. U.S. Bureau of Land Management. Unpublished Report. U.S. Bureau of Land Management, Idaho State Office, Boise, Idaho.
6.	3.2.1	Pg 3-26; lines 3-11	Actually, the work of preparing the R-Value map was an interagency effort involving the BLM, USFS, NDOW and other agencies and not necessarily just an NDOW effort. Please reflect this in the text.
7.	3.2.1	Pg 3-17; line 1	Add the word "categorization" between habitat and mapping
8.	3.2.1	Pg 3-22; lines 4-5	The definition of a "Pending Active" status lek is: "two or more males observed only once in the last five years with no other visits conducted".
9.	3.2.1	Pg 3-26; lines 13-14	This section describes the role of climate change on invasive species. It is also important to point out the role of livestock grazing, especially improper livestock grazing practices, and how it can proliferate invasive species establishment and expansion. See Reisner et al. 2013.
10.	3.2.1	Pg 3-27; map	The colors are difficult to distinguish. Please make the colors more contrasting
11.	3.2.1	Pg 3-30; lines 19-36	It may be appropriate to also include "Pending Active" status leks in the analysis as well. Many of these leks are likely active.
12.	3.2.1	Pg 3-30 line 20	Unclear what "every fifth watershed" means. Does this mean one in five watersheds is vulnerable? Or was it supposed to be "every watershed"?
13.	3.2.1	Pg 3-31; lines 12-14	This sentence says that "no season range connectivity currently exists across this corridor (I-80)". I'm not sure that I agree with this statement because limited telemetry indicates movement of birds from Clover Valley across the interstate north of the Beverly Hills exit. There is also likely movement of birds across I-80 near Oasis.
14.	3.2.1	Pg 3-34; lines 38-40	For the Northwest Interior populations, there are only small portions of seven PMUs mapped because of the influence of fire and the suspected ability of these areas to recover more so than "based on the lack of leks" as suggested in this sentence.
15.	3.2.1	Pg 3-38; lines 5-8	May be worthwhile to specifically mention the Lost Fire as this was a relatively significant event for the Massacre PMU.

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Cmt #	Section	Line	Comment
16.	3.2.1	Pg 3-39 line 34	Is the increase from less than 7.1 to 7.6% due to renewables or due to all infrastructure? This paragraph is unclearly structured. The second sentence emphasizes renewables, but that should come later in the paragraph unless that is the main emphasis. Is renewables the concern because it is 0.2 of the 0.5% expected increase in development?
17.	3.2.1	Pg 3-40; lines 9-22	The effects that livestock grazing has on establishment and expansion of invasive species such as cheatgrass should be discussed in this section. See Reisner et al. 2013.
18.	3.2.3	p. 3-47; line 21	Add the word "quality" between water and on at the beginning of the sentence
19.	3.2.4	p. 3-57; line 23	Properly identify the Nevada "Department" of Wildlife. It is not a Division.
20.	3.2.4	p. 3-58; line 1	Add the words "Northern Great Basin" after Great Basin and before Modoc.
21.	3.2.4	Pg 3-58 line 28	Should be "elevational distribution", not altitudinal distribution.
22.	3.2.4	Pg 3-58 line 2 thru pg 3-60 line 38	This text is not applicable here. Most of it is presented in Section 3.3.1. Under BLM, present a summary of what is considered a BLM sensitive or special status species, as is done with Forest Service (pg 3-60 lines 7-18).
23.	3.2.4	Pg 3-60 line 39 thru pg 3-61 line 5	This text should go under Species Accounts (pg 3-61 line 19).
24.	3.2.4	Pg 3-62; lines 31-37	A citation is required for the study discussed here.
25.	3.2.4	Pg 3-62; line 44	A citation is required for the study discussed here.
26.	3.2.4	Pg 3-64; line 1	Immigration is misspelled.
27.	3.2.4	Pg 3-66 Table 3-14	The use of the footnote is confusing. It is used on the title of the table and on the two bird species. Are all species in this table excluded from further analysis? Or just the two bird species? Use the foot note in one place or the other, but not both. As well, the use of the word "hypothetically" is unclear.
28.	3.3.1	p. 3-77; line 3	Provide a unit such as "foot" after the 3-
29.	3.3.1	Pg 3-81; lines 16-32	The effects that livestock grazing has on establishment and expansion of invasive species such as cheatgrass should be discussed in this section. See Reisner et al. 2013.
30.	3.3.2	3-94; Table 3-25	Tables should have sub-total acreages by Surface Management Agency for both PPH and PGH as well as a row for total acres of wildland fire at the bottom of the table.
31.	3.3.2	3-96; 9	Threat is misspelled.
32.	3.3.2	3-96; 10-14	This paragraph needs some further discussion. Findings within Chapter 23 of the SAB volume by Pyke and Reisner et al. 2013 should be brought into the discussion.

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Cmt #	Section	Line	Comment
33.	3.3.3	3-98; Table 3-28	Tables should have sub-total acreages by Surface Management Agency for PPH and PGH as well as a row for total acres of High Probability at the bottom of the table.
34.	3.3.3	3-104; Table 3-31	Tables should have sub-total acreages by Surface Management Agency for PPH and PGH as well as a row for total acres of grazing allotments at the bottom of the table.
35.	3.3.4	3-111; Table 3-35	A row for total acres should be included at the bottom of the table.
36.	3.4.1	p. 3-134; 14	Add and "s" after the word well
37.	3.4.1	p. 142; 2	Add the word "a" between are and significant
38.	3.4.1	Pg 3-148 Table 3-47	This table lists 2010 twice. One of these should be corrected to 2011, I assume.
39.	3.5.2		Formatted font for headings within this section is not used consistently and therefore makes the section confusing. Fix formatted font for headings.
40.			In Chapter 3, three categories of minerals are presented: leasable minerals, locatable minerals, and mineral materials. In Chapter 4, it switches to fluid materials, locatable materials and salable materials. For clarity and consistency through the document, it is recommended to use leasable, locatable, and salable –based on the acts upon which the resource management is based.

CHAPTER 4-ENVIRONMENTAL CONSEQUENCES
COMMENT MATRIX

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT **Date: 6/28/2013**

Cmt #	Section	Line	Comment
1.	General		There is no acronym list for this chapter.
2.	General		In Chapter 3, three categories of minerals are presented: leasable minerals, locatable minerals, and mineral materials. In Chapter 4, it switches to fluid materials, locatable materials and salable materials. For clarity and consistency through the document, it is recommended to use leasable, locatable, and salable –based on the acts upon which the resource management is based.
3.	General		As the document is currently written, NDOT is unable to determine what the impacts of each alternative may have directly or indirectly on Nevada's Interstates, US Highways and State Routes. As a cooperating agency, NDOT believes that we have not been afforded the level of input and consideration of our input in the development of the proposed alternatives. NDOT also believes that the proposed alternatives need to be more refined in consultation with the alternative proponents, cooperating agencies, and stakeholders. At this point NDOT is unable to make any reasonable assessment of the binding financial or operational impacts each alternative would have for many many years while we all endeavor to preserve and hopefully enhance Greater Sage Grouse populations.
4.	General		The organization of this chapter makes it very hard for a NEPA practitioner to follow let alone a member of the public. This chapter should be reorganized for ease of reading and access to information so that impacts to resources can be followed by resource and by alternative. The way it is currently written if you wanted to know how an alternative would impact grazing, mining, or transportation, etc. you need to go to literally dozens of pages spread out through more than 200 hundred pages. The current format makes it very difficult to ascertain which alternative has which impacts.
5.	General		Too much use of acronyms. There should be a limit to the number per sentence to make the sentences more readable
6.	General		PH and PPH have been used interchangeably. At this point there should only be PPH or PPG
7.	4.2.1	25	Suggest using comma to separate the words "resource" and "or" rather than the hyphen currently in use
8.	4.3.1	Pg 4-8 line 36	Knick and Connelly 2011 does not work as a citation here. That article references nothing on distances from roads. You may have meant Connelly et al 2004 p13-12.
9.	4.3.4	Pg 2-15; line 11	Raptors should be changed to "avian predators" to include ravens and other non-raptors such as jays and magpies
10.	4.3.2	4-18 lines 27-31	"Implementing management for the following resources would have negligible or no impact on Greater Sage-Grouse and are therefore not discussed in detail: travel and transportation management, recreation, lands and realty, range management, fluid minerals, solid minerals, mineral split-estate, fire and fuels management, habitat restoration and vegetation management, and ACECs." Above and below this paragraph you discuss impacts from travel and transportation; lands and realty;, livestock grazing and wild horse and burros which I assume is range management; leasable, locatable, and salable minerals which I assume is fluid, solid and split estate; fuels and fire management, and vegetation and soils management which I assume is habitat restoration and veg management. This paragraph needs to be cleaned up to accurately reflect what is and is not discussed.
11.	4.3.4	p. 4-25 ; line 10	Add: "Energy Development' after Wind in the section title
12.	4.3.4	p. 4-26; Lines 1	Add: "Energy Development" after Solar in the section title

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Cmt #	Section	Line	Comment
13.	4.3.6	p. 4-38; Lines 1 and 3	Add:" Energy Development "after Wind and Solar in the section titles
14.	4.3.7	p. 4-42; line 1	Add: "Energy Development" after Solar in the section title
15.	4.3.8	p. 4-44; lines 7-11	The description of the habitat disturbance limitations in Alternative E has been represented 3 ways. Please follow : disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT and 20%/year for potential habitat). See also p4-142 line 31 and 4-143 line 37
16.	4.3.8	p. 4-45; lines 6-7	This sentence is a run on and not understandable. Even if a period is inserted before "Due", the point of the latter sentence is still not clear.
17.	4.3.8	4-45 line 2-16	This description of impacts from Vegetation and Soils management for alternative E does not match Alternative E at all. Many of the management actions are actually for Alternative F. It is recommended that this entire paragraph be reviewed and rewritten to more accurately reflect the management suggested by Alternative E.
18.	4.3.8	4-45 line 4	Alternative E does not manage for PPH. It manages for Occupied, Suitable and Potential. If PPH is being used as a proxy for Occupied, then such should be stated. Similarly, in the subsequent sentences, the use of "general habitat" as a proxy for "suitable" should be stated, and the use of "restoration habitats" for "potential" should be stated. However, as noted in the above comment, this language is perhaps erroneously included from Alternative F. Please review and re-write.
19.	4.3.8	4-45 line 9-19	Alt E does not propose habitat reserves; does not propose resting treatment areas for a minimum of three years; does not propose vegetation treatments, does not propose evaluation of existing non-native seeding, etc. etc.
20.	4.3.8	p. 4-45; lines 29-31	Is this supposed to be "Promotion of riparian grazing **management**…."?
21.	4.3.8	4-45 line 29	Clarify what the difference is between managing for "PFC only" and not enhancement. How is enhancement being defined here? PFC is the standard that the NV BLM Field Office uses for defining goals for rangeland health (Table 3-11; pg 3-44). Why is the State Of NV's alternative being held to a higher standard than the BLM. This needs to be clarified or removed from the discussion. (Refer to pg 3-45). Refer to Table 2-5 on pg 2-135; Alts B and D in addition to E have as an action to "manage riparian areas and wet meadows to proper functioning condition". This needs to be taken out.
22.	4.3.8	4-45 line 29-30	Alt E does not promote riparian grazing. It manages for riparian grazing through the suggested infrastructure. Change sentence to read, "Grazing in riparian areas would be allowed; however, specific management actions, such as fencing, alternative water sources, would be used to facilitate changes in duration and season of use to maintain or achieve PFC in riparian areas."
23.	4.3.8	4-45 line 31-32	This sentence indicates that Alt E would provide less protection than Alt A as there are fewer regulatory mechanisms. Please clarify what mechanisms A has that E does not. Because many of the management actions presented in the Livestock Grazing Management section are not accurate, the evaluations are not accurate either. The analysis should be re-done with the correct management actions.

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Cmt #	Section	Line	Comment
24.	4.3.8	4-45 line 36-37	This sentence states that more areas would be available for livestock use under Alt E than under Alt A. However, the sentence in line 23-24 states that there would be no change in acres from existing areas open to grazing. This is inconsistent and nothing in Alt E suggests more areas be open to livestock use. Please rectify and evaluate Alt E as having fewer impacts to sage-grouse than Alt A.
25.	4.3.8	4-45 lines 5-8	We disagree with the assertion that the pre-suppression and suppression action proposed by Alt E would provide minimal protections and improvement to GSG habitat. What assumptions are being made to draw this conclusion?
26.	4.3.8	4-46 line 11-13	This summary of management from Alt E is incorrect. Alt E does not call for the closure of PPH and PGH to leasing. This is the same error as under Vegetation and Soils. A discussion should be provided on the management strategies of Alternative E that include: avoid, minimize, mitigate policy; disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT; encouraging a conservation ethic in the mining industry; and implementation of the mitigation credit system. These concepts will go above and beyond Alternative A in affording protection to sage-grouse and their habitat due to impacts from fluid mineral development.
27.	4.3.8	4-46 line 15	The management strategies in Alt A and Alt E for Locatable and Salable Minerals are not the same. A discussion should be provided on the management strategies of Alternative E that include: avoid, minimize, mitigate policy; disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT; encouraging a conservation ethic in the mining industry; and implementation of the mitigation credit system. These concepts will go above and beyond Alternative A in affording protection to sage-grouse and their habitat due to impacts from locatable and salable mineral development.
28.	4.3.8	4-46 line 17-18	Alt E does not discuss ROW exclusion or avoidance. This sentence implies that Alt E specifically states that no areas would be managed as such. If topics are not mentioned in Alt E it should be assumed the default is that which is presented under Alternative A, not that no management be used. Thus, this section should state, "Management under Alternative E would retain the same number of acres managed as ROW exclusion and avoidance areas as found under Alternative A."
29.	4.3.8	p. 4-46; 22, 24	Identify the conditions for "when possible" so the reader can evaluate this alternative
30.	4.3.8	4-46 line 29-31	Please clarify why Alt E would provide fewer regulatory mechanisms that Alt A. As stated in a previous comment, Alt E does not address ROW exclusions and avoidances thus it should be assumed to maintain the existing management conditions (those presented in Alt A).
31.	4.3.8	4-46 line 35-38	Alt E does not discuss avoidance or exclusion areas for wind and solar. As it is not discussed, it should be assumed by default to follow existing conditions under Alt A, not that there would be possibility of more land use. As well, because Alt E does recommend siting energy projects in non-habitat areas, this goes above and beyond measures in Alt A. Please reevaluate that impacts to sage-grouse from renewable energy would be less than Alt A.
32.	4.3.8	4-46 line 40	This should read, "Less than impacts from Alternative A".
33.	4.3.8	4-47 line 2	This should read, "Less than impacts from Alternative A".
34.	4.3.8	4-47 line 4	Alt E does recommends the concept of avoid minimize mitigate for OHV use. This goes above and beyond measures in Alt A. Please reevaluate that impacts to sage-grouse from travel and transportation would be less than Alt A.

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35.	4.3.9	4-47 line 16-26	This section sporadically references Alt E- however this is the section for Alt F. This needs to be fixed. The sentences in line 17-20 and in 21-22 are directly contradictory- likely because of the confusion of Alt E vs. Alt F. Please review and rectify.
36.	4.3.9	4-48 line 4	This section references Alt E, but should state Alt F. Other than that, the evaluation appears correct.
37.	4.3.9	p. 4-48; 37	Add:"Energy Development" after Wind in the section title
38.	4.3.9	p. 4-49; 1	Add: "Energy Development" after Solar in the section title
39.	4.3.9	4-49 line 2	The impacts from Solar for Alt F are not the same as for Alt E (which is the same as Alt A). Please review and rectify.
40.	4.4.8	p. 4-68; 29	Replace "sets disturbance at 5 percent" with "disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT".
41.	4.4.8	Pg 4-69; line 24	The phrase "Alt E could have fewer impacts on water resources than Alt A." Replace water resources with "riparian and wetland areas"
42.	4.4.8	All	Is identifying the number of acres the only standard that BLM is using to determine if a proposed action would be different from Alt A (no action)? While Alt E does not specifically identify number of acres for different types of treatments, it does propose polices and treatments that are different from current polices. Therefore, a more thorough analysis needs to be done to determine if the environmental impacts would be different than "no action." Identifying number of acres is not the only way to change policy that will have real implications on the ground. We disagree with the conclusion that Alt E would be the same as Alt A.
43.	4.4.8	Pg 4-68; lines 26-40	We disagree with the conclusion that impacts on riparian and wetland areas from GSG management under Alt E would be the same as Alt A. Alt E proposes a hierarchical decision process of avoid, minimize, mitigate in order to achieve the goal of no net loss of occupied, suitable, and potential sage-grouse habitat. In addition, any disturbance or development would be required to offset impacts through the mitigation credit system. This would have greater beneficial impacts than Alt A in this case.
44.	4.4.8	Pg 4-68; lines 31-31	We disagree with the conclusion that impact on riparian and wetland areas from wildlife management under Alt E would be the same as Alt A. See above comment.
45.	4.4.8	Pg 4-68; line 29	Replace"sets disturbance at 5 percent" with "disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT".
46.	4.4.8	Pg 4-68; lines 37-40	We disagree with the conclusion that impacts on riparian and wetland areas from vegetation management under Alt E would be the same as Alt A. While Alt E does not identify specific numbers of acres of vegetation treatments, it is incorrect to state that Alt E does not identify specific types of treatments. Alt E identifies treatments such as treatment of PJ encroachment, treatment of invasive species such as cheatgrass, greenstrips, and post-fire re-seeding. Please refer back to the original proposal submitted by the state. We believe this would have greater beneficial impacts that Alt A.
47.	4.4.8	Pg 4-69; lines 10-18	We disagree with the conclusion that impacts on riparian and wetland areas from grazing management under Alt E would be the same as Alt A. Please refer to TMA-12 – TMA-12.2.
48.	4.4.8	Pg 4-69; lines 26-30	We disagree with the conclusion that impacts on riparian and wetland areas from wild horse and burro management under Alt E would be the same as Alt A. The writer clearly states that these polices would reduce impacts on riparian areas and indirectly benefit riparian areas. We therefore believe this would have greater beneficial impacts than Alt A.

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49.	4.4.8	Pg 4-69 – 4-70; lines 31-39 – 1-4	We disagree with the conclusion that impacts on riparian and wetland areas from leasable, locatable, and salable minerals management under Alt E would be the same as Alt A. While Alt E does not identify areas as open or closed from minerals development, it does identify Occupied, Suitable, and Potential habitats and proposes no net loss of these habitats through a policy of avoid, minimize, mitigate. Disturbances from mineral development would first be avoided in sage-grouse habitat. If that is not possible disturbances would be minimized to reduce impacts. Any disturbances that impact sage-grouse habitat would be required to mitigate through the mitigation credit system. This would offset the effects and allow for no net loss of habitat. Therefore, we believe this would have greater beneficial impacts than Alt A.
50.	4.4.8	Pg 4-70; lines 5-9	We disagree with the conclusion that impacts on riparian and wetland areas from lands and realty management under Alt E would be the same as Alt A. Alt E proposes to "avoid" disturbances and development in Occupied, Suitable, and Potential habitat. We believe that is equivalent to a "ROW avoidance" policy. Therefore, we believe this would have greater beneficial impacts than Alt A.
51.	4.4.8	Pg 4-70; lines 10-14	We disagree with the conclusion that impacts on riparian and wetland areas from travel and transportation management under Alt E would be the same as Alt A because of the policy of avoid, minimize, mitigate. See above.
52.	4.4.8	Pg 4-70; lines 10-14	We disagree with the conclusion that impacts on riparian and wetland areas from recreation management under Alt E would be the same as Alt A because of the policy of avoid, minimize, mitigate. Also, it is untrue that Alt E does not identify areas as closed to recreational use, or specify any conservation measures associated with recreation. Refer to TMA-16 – TMA-16.2. Therefore, we believe this would have greater beneficial impacts than Alt A.
53.	4.5.8	All	We disagree with the conclusion that Alt E does not outline specific management actions that would result in similar impacts as Alt A. The only basis the writers use to draw these conclusions is that Alt E does not identify acreages for PPH and PGH, areas for Row exclusion or avoidance, or areas closed to specific land uses, such as grazing or mining. However, Alt E does lie out of policy of "avoid, minimize, mitigate" which would reduce land disturbances and result in fewer impacts to water resources. In addition a mitigation credit system would be developed that would allow for improvements to water resources, particularly riparian areas which are important brood-rearing habitat for sage-grouse. Move over, while Alt E does not identify PPH and PGH, it delineates SGMAs and develops new habitat classifications, including: Occupied Suitable, and Potential. These new habitat classifications were not mapped, but in other sections of this document the writers use PPH and PGH as designation for Occupied/ Suitable and Potential habitat respectively. Why is this not applied uniformly throughout the document? Alt E *does* specify limitations on surface disturbance activities, including: surface disturbances greater than or equal to five percent of 640 acres in Occupied and Suitable habitat will trigger consultation with the Nevada Sagebrush Ecosystem Technical Team and habitat disturbances will be limited to not more than twenty percent per year, per SGMA in Potential Habitat. These policies should be analyzed in order to adequately determine the impacts of Alt E. We encourage the BLM to reanalyze the impacts of Alt E.
54.	4.5.8	Pg 4-88; lines 7-11	We disagree with the conclusion that impacts on water resources from GSG management under Alt E would be the same as Alt A. See above.

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55.	4.5.8	Pg 4-88; line 10	Replace "sets disturbances at 5 percent" to "disturbances greater than or equal to five percent of 640 acres will trigger consultation with the Nevada Sagebrush Ecosystem Technical Team".
56.	4.5.8	Pg 4-88; lines 12-16	We disagree with the conclusion that impacts on water resources from lands and realty management under Alt E would be the same as Alt A. See above. In addition, Alt E proposes to "avoid" disturbances and development in Occupied, Suitable, and Potential habitat. We believe that is equivalent to a "ROW avoidance" policy.
57.	4.5.8	Pg 4-88; lines 17-21	We disagree with the conclusion that impacts on water resources from renewable energy management under Alt E would be the same as Alt A. See above. In addition, Alt E proposes to "avoid" disturbances and development in Occupied, Suitable, and Potential habitat. We believe that is equivalent to a "ROW avoidance" policy.
58.	4.5.8	Pg 4-88; lines 22-24	We disagree with the conclusion that impacts on water resources from livestock grazing management under Alt E would be the same as Alt A. See above.
59.	4.5.8	Pg 4-88; lines 25-28	We disagree with the conclusion that impacts on water resources from wild horse and burro management under Alt E would be the same as Alt A. See above.
60.	4.5.8	Pg 4-88; lines 29-35 and pg 4-89; lines 1-4	We disagree with the conclusion that impacts on water resources from leasable, locatable, and salable minerals management under Alt E would be the same as Alt A. See above.
61.	4.5.8	Pg 4-89; lines 5-14	We disagree with the conclusion that impacts on water resources from vegetation & soils and fire & fuels management under Alt E would be the same as Alt A. See above. While Alt E does not specify numbers of acres for vegetation, fuels management, and post-fire rehabilitation treatments it does specify vernal actions for types of treatments. This analysis is faulty and reaches an incorrect conclusion that it would have the same impacts as Alt A. In addition, Alt E proposes the creation of a mitigation credit system that would expand the implementation of these treatments and provide for "no net loss" of sage-grouse habitat. In fact, TMA-1 states the as many acres of habitat that are lost to wildfire should be treated, rehabilitated, and restored.
62.	4.5.8	Pg 4-89; lines 15-19	We disagree with the conclusion that impacts on water resources from travel and transportation management under Alt E would be the same as Alt A. See above.
63.	4.5.8	Pg 4-89; lines 20-23	We disagree with the conclusion that impacts on water resources from recreation management under Alt E would be the same as Alt A. See above.
64.	4.5.8	Pg 4-89; lines 24-29	We disagree with the conclusion that impacts on water resources from riparian management under Alt E would be the same as Alt A. See above.
65.	4.7.2	Pg. 4-94; line 6	Suggest replacing the word "invasion" with "encroachment". Pinyon/juniper are native species that naturally encroach into sagebrush ecosystems in the absence of fire and when soil and moisture requirements are met.
66.	4.7.2	Pg. 4-94; line 11	ESR - Emergency Stabilization and Restoration or Emergency Stabilization and Rehabilitation? A glossary of terms and acronyms would be a welcome addition to each chapter.

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67.	4.7.2	Pg. 4-94; line 40	The word "encroachment" is used here, rather than "invasion" as in line 6 of the same page. Suggest making the word "encroachment" uniform throughout the document when referring to movement of pinyon/juniper and other native woody shrubs and conifers into sagebrush ecosystems. The word "invasive" or "invasion" should be used in conjunction with invasive annual and perennial non-native plant species, rather than native species that could be encroaching into the sagebrush ecosystems due to fire exclusion, short or long term climatic variation, or other factors related either to management or natural cyclic changes.
68.	4.7.5	Pg 105	BLM/USFS must further refine assumptions for the resource analysis. For example on p. 4-105 "Under Alternative B, new ROW actions would be restricted to the footprint of existing ROW. This would keep any new disturbance to vegetation or soils to previously disturbed locations." To make these statements true and applicable it must be assumed that that any previously granted ROW is to be assumed to be entirely disturbed **regardless of the actual disturbance**. For example NDOT ROW on BLM easements is on average 400' wide where only maybe 100' the ROW has been previously disturbed. NDOT strongly supports including language supporting the assumption that for the intents of this EIS, and for the implementation of any measures proposed in the alternatives for future undertakings, that all previously granted ROW be considered totally disturbed regardless of the actual amount of land/vegetation disturbance. Clarifying this assumption would directly determine the applicability of NDOT to having to mitigate any disturbance to sagebrush habitat up to or exceeding the 3% as noted on p. 4-106, lines 2 and 21.
69.	4.7.5	Pg 4-106; line 19	It is unclear how conditions of each alternative within each resource would influence activities within a another resource. Language is unclear in some areas as to affect on activities within existing NDOT ROW. For example on p. 4-106, line 19, it notes that for this particular resource (Vegetation and Soils) that "limiting or prohibiting construction of new roads would minimize disturbance to vegetation and soils in priority habitat." How is NDOT to interpret this? Is this applicable to only actions proposed for priority habitat or also general habitat? What is a new road? Additional travel lanes separated by a dirt median within existing ROW? New road on new/additional ROW?
70.	4.7.6	Pg. 4-108; line 17	Sentence currently reads "Fuels treatments would focus on areas human habitation or in areas of significant…" suggest inserting the preposition "of" between the word "areas" and the word "human" for clarity.
71.	4.7.8	p. 4-114; 6, 14	Replace "disturbance would be limited to 5 percent in occupied or suitable habitat" to "disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT"
72.	4.7.8	p. 4-114; 35	Identify when avoidance is appropriate and practicable so the reader can evaluate this alternative
73.	4.7.8	Pg. 4-115; line 30	One correction and one suggestion in line 30. Replace "Department" with "Division" so that "Nevada Division of Forestry" replaces "Nevada Department of Forestry". Consider adding the word "Fire" before the word "Protection" so that the phrase reads as "County Fire Protection Districts" rather than" County Protection Districts" as this is the terminology used in the Nevada Revised Statutes (NRS 472, 473, 474) concerning FPDs and by the districts themselves.
74.	4.7.8	Pg 4-115; line 32	We disagree with the characterization that Alt E would only apply to Nevada
75.	4.8.2	Pg. 4-121; lines 34 & 35	"Wild Horse and Burro grazing can impact the ability to manage fires as a natural process changes in fine fuel availability (e.g., perennial grasses)". Consider rewriting this sentence for increased clarity. One possible change would be "…manage fire as a natural process **through** changes in fine fuel availability…".

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76.	4.8.4	Pg. 4-130; lines31 & 32	Duplicate of criticism above. This is likely a cut and paste error. Recommend searching through document for similar sections related to wild horse and burro grazing and changes in fine fuel availability.
77.	4.8.7	p. 4-140; 24	Add the word "increases" at the end of the sentence after activities.
78.	4.8.8	Pg 4-142; lines 14-17	While Alt E does not delineate PPH and PGH, it does identify Occupied, Suitable, and Potential habitat. In other parts of the document the writer use PPH and PPG in place of the new habitat definitions and here they do not. Be consistent in your approach. We also disagree that under Alt E, California lands would follow Alt A.
79.	4.8.8	p. 4-142; 30	There is text missing at the beginning of the sentence between from and would. It may be "Alternative E"
80.	4.8.8	Pg 4-143; line 30	We disagree that impacts from livestock grazing on wildland fire would be the same as Alt A. Please explain how the writers arrived at this conclusion, and correct the error.
81.	4.8.8	p. 4-143; 34	What is sagebrush habitat protection restoration? Either its protection or restoration.
82.	4.8.8	Pg 4-144; lines 24-36	We disagree with the conclusions that Alt E would be the same as Alt A in these instances. The analysis is faulty and needs to be redone.
83.	4.8.9	Pg 145 Line 31	Should read, "Under alternative F…"
84.	4.9.5	p. 4-160; 30	Add the word "to" between due and more
85.	4.9.5	Pg 4-160; lines 33-37	Without clearly stated exemptions/exclusions for Interstate, US Highways and State Routes, how can NDOT interpret statements such as this not substantially impacting their facilities.
86.	4.9.5	Pg 4-162; lines 38-39	Exceptions such as? Provide one or two specifically being proposed here in parenthesis.
87.	4.9.8	Pg 168 Line 17	Alt E promotes proper grazing practices that promote the health of perennial grasses to suppress the establishment of annual grasses. It also encourages that existing grazing permits maintain or enhance SGMA range conditions. It promotes grazing management strategies in riparian areas that, at a minimum, maintain or achieve PFC and allows for flexibility, review, and change in grazing management practices in order to sustain the resource within acceptable limits.
88.	4.9.8	Pg 168 Line 17	Alt E promotes NRCS conservation practice standard 528
89.	4.9.8	Pg 168 Line 17	Alt E allows for the flexibility in management activities that address actual rangeland conditions.
90.	4.9.8	Pg 168 Line 17	Alt E promotes water developments that improve conditions within SGMAs.
91.	4.9.8	Pg 168 Line 17	Alt E addresses particular issues with fencing near GSG leks.
92.	4.9.8	Pg 4-168 lines 12-35	We disagree with the conclusions that livestock grazing management under Alt E would be the same as Alt A (no action). It is unclear how the BLM arrived at these conclusions because there is no analysis included in this section for the reader to analyze. The analysis needs to be redone or at the very least include your reasoning for arriving at these conclusions.
93.	4.10.7	Pg 4-180; lines 35-36	Again, is the impact from this alternative supposed to be, and is specifically to be interpreted by NDOT and others that our existing highways may be subject to restrictions in use and closures? Clarity is needed.

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94.	4.10.8	Pg 182 Line 6	Misleading. Alt E simply states that HMA's should be managed at AML that should avoid and minimize impacts in SGMAs.
95.	4.10.8	Pg 182 Line 6	Potential federal legislation to resolve conflicting language in the Wild and Free Roaming Horse and Burro Act and the Endangered Species Act.
96.	4.10.8	Pg 182; lines 27-31	Again, is the impact from this alternative supposed to be, and is specifically to be interpreted by NDOT and others that our existing highways may be subject to restrictions in use and closures? Clarity is needed.
97.	4.10.9	Pg 184; lines 33-36	Again, is the impact from this alternative supposed to be, and is specifically to be interpreted by NDOT and others that our existing highways may be subject to restrictions in use and closures? Clarity is needed.
98.	4.11.8	4-194 line 37	In the intro paragraph it states that impacts will be the same as Alt A, but then under Sage-Grouse Management it says the same as Alt B. We do not agree with either portrayal. Please clarify.
99.	4.11.8	4-195 line 2-6	The discussion does not tie fire suppression to climate change. The concluding statement talks about water resources which has nothing to do with fire or climate change and then states that it would have fewer impacts than Alt A, though it has been previously stated impacts would be the same as Alt A for climate change. Please clarify.
100.	4.12	Section	The use of headers in this section is not consistent – specifically use of Leasable, Fluid, Oil and Gas, and Geothermal. The order and heading size is not consistent and leads to confusion.
101.	4.12.1	4-196 line 31-32	Condition of Approval is not presented in the glossary. Please add or change sentence.
102.	4.12.4	4-200 line 37-38	This is Alt A- existing conditions. Table 3-54 "Acres of ROW Exclusion/Avoidance Areas within Sage-Grouse Habitat in the Planning Area" indicates that there are areas of ROW avoidance and exclusion. However, line 38 says that no areas would be managed as exclusion or avoidance. Please clarify.
103.	4-12	4-203 line 30-31	Alt E recommends the concept of avoid, minimize, mitigate for energy development (which includes fluid minerals). This goes above and beyond measures in Alt A. Please reevaluate that impacts to sage-grouse from fluid minerals would be less than Alt A.
104.	4.13.8	4-208 line 23-26	Alt E does not manage for PPH and PGH. Please review.
105.	4.14.8	4-212 line 33-36	Alt E does not manage for PPH and PGH. It manages for occupied, suitable, and potential habitat. Within occupied and suitable habitat, disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT. This should read, "Additional restrictions would apply within the federal mineral estate within occupied and suitable habitat, including disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT."
106.	4.14..8	4-213 line 1-2	Alt E does not manage for PPH. This should read, "Federal mineral estate in the decision area outside occupied, suitable, and potential habitat would be subject to the same management as that under Alternative A."

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107.	4.15.3	Pg 4-216; line 41	Is this what NDOT should use as an assurance that its Interstates, US highways, and State Routes will not be subjected to closure based on management proposed in these alternatives? If so, we would like to see it clearly stated. If not, then we request the inclusion of such a clarification. If it is the intention that any of the management actions proposed in this document may result in the permanent or temporary closure of an Interstate, US highway, or State Route then that must also be clearly stated.
108.	4.15.3	Pg 4-217; line 15	Provide reference to appropriate map
109.	4.15.5	Pg 4-220; line 14	Supposed to say "… would be no opportunity for new ROW development."?
110.	4.15.6	Pg 224; line 7	Provide reference to appropriate map
111.	4.15.6	Pg 224; lines 12-13	Any discussion of "removal of infrastructure, including unnecessary roads" must be more specific. Are NDOT's Interstates, US highways, or State Routes meant to be considered here if they reside within one of ACECs? If not then clearly state that. If yes, then also clearly state that (that will precipitate a whole new comment).
112.	4.15.7	Pg 225; line 27	Would improvements/upgrades road type be allowed?
113.	4.15.8	Pg 4-226; lines 17-19	The first sentence of this paragraph is unclear and poorly constructed. Please clarify what is meant.
114.	4.15.8	Pg 4-226; lines 16-33	We disagree with the BLM's conclusion that impacts on lands and realty from GSG management under Alt E would be the same as Alt A. In this section it states that these policies would "limit the BLM and Forest Service's ability to accommodate demand for renewable energy ROW/ SUA development". If these policies are so limiting, how can they be the same as Alt A (No Action)? We believe that Alt E is equivalent to Alt D in this section. Alt E lays out a policy of "avoid, minimize mitigate" in sage-grouse habitat in order to achieve the goal of **no net loss of Occupied, Suitable, and Potential sage-grouse habitat**. Under Alt E, new disturbances should first try to be **avoided** within sage-grouse habitat. If the disturbance cannot be avoided, then the affects will be **minimized** by through actions such as co-location of structures and reducing the activity footprint. **Mitigation** will be required by any disturbance activities in which project proponents will have to pay into a mitigation credit system in order to offset the effects of the disturbances and achieve the state's goal of no net loss of sage-grouse habitat. We believe that this is equivalent to the actions proposed in Alt D, in which PPH would be designated as ROW/ SUA **avoidance** areas and development would have to incorporate **mitigation** measures in order to result in **no net un-mitigated loss of PPH habitat**. We argue that the State's policy of avoidance in Occupied, Suitable, and Potential habitat is an equivalent policy as ROW avoidance in PPH and PPG. The analysis of Alt E in this section is faulty and needs to be redone.

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115.	4.15.8	Pg 4-226; lines 37-41 and Pg 4-227; lines 1-3	We disagree with the conclusion that impacts on lands and realty from mineral management under Alt E would be the same as Alt A. Again, Alt E proposes a policy of avoid, minimize, mitigate, which would seek to avoid disturbances in sage-grouse habitat wherever possible. We also argue that the State's policy of expend all means to avoid first, is equivalent to the BLM's ROW avoidance area designation. The analysis of this section needs to be redone.
116.	4.15.8	Pg 4-227; lines 4-7	We disagree with the conclusion that impacts on lands and realty from travel and transportation management would be the same as Alt A because of the policy of avoid, minimize, mitigate and the reasons already stated above.
117.	4.15.8	Pg 4-227; lines 9-18	We disagree with the BLM's conclusion that impacts on lands and realty from renewable energy management under Alt E would be the same as Alt A for many of the same reasons stated above. Again, Alt E describes a hierarchical "avoid, minimize, mitigate" decision process in which any proposed disturbance, including renewable energy projects, should first try to be avoided in occupied and suitable habitat. If the project cannot be avoided, then minimization and mitigation will be required. The alternative does not reduce or eliminate renewable energy development within PPH and PGH. Alt E is not being adequately represented in this section and the writers demonstrate a lack of understanding of what is proposed in the alternative. The analysis of this section is faulty and needs to be redone.
118.	4.15.8	p. 4-227; 11	Identify the conditions that would make facility siting possible to allow this alternative to be evaluated
119.	4.15.9	Pg 4-228; lines 4-7	New road construction should be defined, New road on new alignment? New ROW? No new road on existing ROW? No improvements to existing roads?...
120.	4.16.2	p. 4-232; 29-36	This paragraph is repeated on page 4-233 on lines 31-38
121.	4.16.6	Pg 4-237; lines 29-31	Any discussion of "removal of infrastructure, including unnecessary roads" must be more specific. Are NDOT's Interstates, US highways, or State Routes meant to be considered here if they reside within one of ACECs? If not then clearly state that. If yes, then also clearly state that (that will precipitate a whole new comment).
122.	4.16.8	Pg 4-239; lines 3-29	We disagree that Alt E impacts on renewable energy from GSG and land and realty management would be the same as A because of the goal of no net loss of sage-grouse habitat that will be achieved through a policy of avoid, minimize, mitigate, mitigation credit system, and oversight and coordination by the Sagebrush Ecosystem Technical Team.
123.	4.17	General	This section and the document could benefit from the Travel and Transportation Management discussions being divided up into three elements. 1) Interstate, US Highway, and State Routes 2) County/municipal roads, and 3) "off system" BLM, forest, private roads. NDOT believes the discussion in this document that may be intended to emphasize habitat management of travel and transportation literally off of the state's highways may lead to unintended regulatory encumbrances for NDOT's Interstates, US Highways and State Routes which would yield minimal or no benefit for the sage grouse and its habitat. At a minimum addressing all of the comments noted above concerning how Interstates, US Highways and State Routes would be affected instead of spreading it out through the various individual resources impacted sections. Are the measures proposed in the alternatives applicable to existing ROW, or only new ROW, or all actions regardless of ROW.

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124.	4.17	General	While acknowledging that NEPA documents are planning level documents, NDOT believes this document needs to better address potential impacts in this document instead of deferring them to the implementation level. Failure to address these issues in more detail at this point is likely to result in the implementation of an alternative that places unanticipated, unexpected, or unwarranted regulatory burdens upon NDOT and other applicants.
125.	4.17	General	The way this section as written it imparts little comprehensive information about what the impacts of the proposed alternatives would be on Transportation within the plan area.
126.	4.17.4	General	Only addresses open, limited, closed designation. Succinctly state the current practice - new roads allowed, upgrades allowed, etc.
127.	4.17.8	Pg 243 Line 12	Misleading. While not specifically addressed in the state plan, anthropogenic impacts in SGMA require the review by the SETT and SEC of our no net loss and avoid, minimize, and mitigate policies.
128.	4.18.8	4-246; lines 10-17	We disagree that impacts to recreation from GSG and travel and transportation management would be the same as Alt A. Please provide an explanation as to why this conclusion was reached. We believe that the analysis should be redone.
129.	4.19.1	4-246 line 39	This should read, "Indicators of impacts on Areas of Critical Environmental Concern are as follows:" Not impacts on Greater Sage-Grouse…
130.	4.19.1	4-247 line 9-12	This bullet point is not clear. Please rewrite so the concept that it is supposed to present is clear.
131.	4.19.2	4-248 line 26	This should read, "…no impact on ACECs and are therefore…". Not no impact on Greater Sage-Grouse
132.	4.20.2	Pg 255 Line 24	While the state plan does not address this directly, it should be pointed out that due to sagebrush ecosystem rangeland improvements and potential changes in grazing management, that while some reductions may occur, the long term objective may actually provide an improvement to current rangeland health conditions that would be beneficial to both wildlife and livestock that would be beneficial to livestock operators and local communities and counties.
133.	4.20.2	Pg 4-263/ 4-264; lines 21-41/1-25	Discussion of impacts to transportation neglects to at least mention increases in emergency response times and the increase in travel costs for road closures restrictions. These could be substantial when dealing with vast areas with minimal/highly dispersed road infrastructure.
134.	4.20.3	4-269; line 15	Consistency with the Nevada's Statewide Transportation Improvement Program as well?
135.	4.20.4	Pg 4-272; lines 19-32	Even though the potential 6000 job losses associated with C and F would be over a broad geographic area and several sectors, are these positions that are tenured by low income and/or minority people who would then be disproportionately impacted?
136.	4.21.8	Pg 4-285; lines 2-3	It is incorrect that Alt E is silent on specific grazing management goals and objectives. Refer to TMA 12, 12.1, 12.2, and 13.

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT Date: 6/28/2013

Cmt #	Section	Line	Comment
137.	4.21.8	Pg 4-285; lines 7-22	We disagree with the conclusions in the locatable, salable, and unleashed fluid minerals management sections. We believe that the analysis method of simply looking at the number of acres closed to development is faulty. Alt E proposes to address these concerns through a policy of avoid, minimize, and mitigate. Under this alternative all efforts will be taken to try to avoid these disturbance activities in sage-grouse habitat. If these activities cannot be avoided, then minimization will be required to minimize impacts on sage-grouse and their habitat. Finally, mitigation will be required through the mitigation credit system which will allow for no net loss of sage-grouse habitat. Since the overall objective is no net loss of sage-grouse habitat, this should either maintain or increase tribal opportunities for traditional tribal practices.
138.	4.21.8	Pg 4-285; lines 30-34	We disagree with the conclusions regarding the impacts on tribal interests from recreation management. Please refer policies TMA-16 – TMA-16.2 and "avoid, minimize, mitigate".
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141.			
142.			

CHAPTER 5-CUMMULATIVE EFFECTS
COMMENT MATRIX

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT **Date: 6/28/2013**

Cmt #	Section	Line	Comment
1.	General		The cumulative impact discussion by resource just appears to reiterate what the impact is without discussing a cumulative effect. The discussion should delve into where the cumulative effect would come from and if the effect would be addressed or exasperated by the alternatives. This section is weakly portrayed and in many cases fails to address the cumulative effect.
2.	General		As the document is currently written, NDOT is unable to determine what the cumulative impacts of each alternative may have on Nevada's Interstates, US Highways and State Routes.
3.	5.1.2	p. 5-5; Table 5-1	An additional column identifying the extent of potential impacts to sage grouse would be very useful in evaluating its contribution to potential impacts to sage grouse populations. In addition some of the status information is not current. We understand that it could be a full time job keeping track of this, so maybe identifying status isn't as important as potential project effect. The information that would be valuable is the number of acres in PPH or PPG.
4.	5.1.3	5-18 line 15	Delete the word, "three". This sentence indicates that infrastructure, mine, and energy will not be evaluated. However pg 5-20 lines 38-43 and pg 5-21 lines 1-28 discusses those threats. Deletion of "three" rectifies this inconsistency.
5.	5.1.3	p. 5-22; Major Threats-Fire	The cumulative effect of wildfire over the past 10 years would have been valuable to discuss. A table showing the number of acres of PPH and PPG by year would vividly express this impact. The recent fires in NW Nevada NE California had a devastating effect last year but this was not discussed.
6.	5.1.3	5-23 line 1-5 5-23 line 37-43	These statements say that cumulative impacts of fire under any of the six alternatives plus past/present/reasonably foreseeable future projects are not expected to cumulatively affect GSGS in Zone III over a critical threshold. However, Chapter 4 indicates that the fire/cheatgrass cycle cannot be managed for (4-12 line 27) and that under any of the alternatives fire would continue to increase in size and frequency and habitat would continue to be lost (Alt A 4-21 line 15-21, Alt B 4-29 line 24-28, Alt C 4-35 line 31-32, Alt D 4-39 line 38-42, Alt E 4-46 line 4-8, Alt F 4-47 line 41). The cumulative impact analysis needs to be redone to acknowledge the analysis in Chapter 4. The cumulative impacts cannot be less than fire alone. In addition, these statements say that (paraphrasing) "because populations are stable (no citation provided), current management would suffice" completely ignores the information on pg 5-18 line 32-34 that indicate this predicted population trends are limited in their ability to predict into the future, especially stochastic events and novel environmental conditions – of which fire is (or causes) both. This cumulative analysis needs to be redone and not founded on contradictory statements.
7.	5.1.3	5-25 line 16	This should read, "Alternative E focuses *on avoiding, then minimizing, then* mitigation, …
8.	5.1.3	5-25 line 17	Replace "limiting disturbance to 5 percent in occupied and suitable habitats" with "disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT".
9.	5.1.3	5-25 line 19-20	Please provide clarification on how the conclusion "but may lead to more acres being impacted overall than Alternative A" was reached.
10.	5.1.3	5-26 line 26-27	Alt E does not manage for PPH and PGH. Alt E should be removed from that sentence and another sentence should be added that states, "Alternative E would prioritize vegetation treatments within occupied, suitable, and potential habitat within SGMAs.". OR perhaps Alt E was supposed to read Alt F because a lot of this text describes Alt F… please review and rectify.

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT Date: 6/28/2013

Cmt #	Section	Line	Comment
11.	5.1.3	5-27 line 6-17	This paragraph discusses "Alt F"- however this discussion really applies to Alt E. This should be reviewed and fixed. Given that, the sentence that indicates that Alt F and Alt C would have similar impacts should be reviewed for accuracy.
12.	5.1.3	5-29 line 27-37	Alt E should be discussed in this paragraph.
13.	5.1.3	Pg 5-25; lines 10-12	Are these same incentives available for non-private entities?
14.	5.1.3	5-42 line 18-19	Alt E does not manage for PPH and PGH. E should be removed from that sentence and another sentence should be added that states, "Alternative E would prioritize vegetation treatments within occupied, suitable, and potential habitat within SGMAs.". OR perhaps Alt E was supposed to read Alt F… please review and rectify.
15.	5.1.3	5-42 line 40-42 5-43 line 1-9	This paragraph discusses "Alt F"- however this discussion really applies to Alt E. This should be reviewed and fixed. Given, that the sentence that indicates that Alt F and Alt C would have similar impacts should be reviewed for accuracy.
16.	5.1.3	5-44 line 25-32	These two sentences are contradictory. It says that amelioration of threats can be greatly enhanced by regulation on state, private and local lands. Then it says most of the land is public and therefore BLM and FS have a greater ability to reduce threats. Please review and rectify.
17.	5.1.3	5-46 line 10-18	The concepts of avoid, minimize, mitigate; disturbances greater than or equal to five percent of 640 acres (32 acres) within Occupied/ Suitable Habitat triggers habitat evaluation and consultation with the SETT; and the mitigation credit system should be discussed in this paragraph. These concepts provide a broad approach and will help avoid cumulative impacts.
18.	5.1.3	5-46 line 14-15	Alt E does not discuss ROW avoidance or exclusion zones. Therefore the default is the existing conditions which would maintain existing ROW regulations. This should be restated and reanalyzed as such.
19.	5.1.3	Pg 46 Line 17	Somewhat misleading. While it does not provide for exclusions, it does address no net loss through avoid, minimize, and mitigate. This in turn, while not outright protecting, may serve to enhance or recover areas of critical need within a SGMA.
20.	5.1.4	Pg 5-48; lines 31-36	We do not understand how it was concluded that the cumulative impacts under Alt E would be similar to Alt A if it states in this paragraph that there would be both direct and indirect positive cumulative effects. The policy of avoid, minimize, mitigate would lead to fewer adverse impacts in riparian and wetland areas than current policies (Alt A). Also, there are specific policies pertaining to riparian and wetland areas that would also improve conditions, such as TMA-18.10 (no surface occupancy restrictions in riparian and wetland areas) and TMA-12.2 (grazing management in riparian Ares should, at a minimum, maintain or achieve PFC). The cumulative impacts conclusion for riparian and wetland areas for Alt E needs to be reconsidered prior to the release of the DEIS.

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT Date: 6/28/2013

Cmt #	Section	Line	Comment
21.	5.1.5	Pg 5-50; lines 21-22	We disagree that Alt E would result in impacts similar to Alt A. The only method the writers use to draw these conclusions is that Alt E does not identify acreages for PPH and PGH, areas for ROW exclusion or avoidance, or areas closed to specific land uses. However, Alt E does lie out of policy of "avoid, minimize, mitigate" which would reduce land disturbances and result in fewer impacts to water resources. In addition a mitigation credit system would be developed that would allow for improvements to water resources, particularly riparian areas which are important brood-rearing habitat for sage-grouse. Moreover, while Alt E does not identify PHH and PGH, it delineates SGMAs and develops new habitat classifications, including: Occupied Suitable, and Potential. Alt E *does* specify limitations on surface disturbance activities, including: surface disturbances greater than or equal to five percent of 640 acres in Occupied and Suitable habitat will trigger consultation with the Nevada Sagebrush Ecosystem Technical Team and habitat disturbances will be limited to not more than twenty percent per year, per SGMA. These policies should be analyzed in order to adequately determine the cumulative impacts of Alt E.
22.	5.1.7	Pg. 5-53; line 24	Punctuation needed? "From 1982 to the present minerals,…"
23.	5.1.7	Pg. 5-53; line 33 & 34	"Emergency stabilization and rehabilitation efforts have limited establishment and spread of annual invasive plants (cheatgrass) in areas treated." While this may occur in specific areas, this statement is not supported by fact range-wide.
24.	5.1.8	Pg. 5-57; lines 11-13	The sentence beginning with "However this effect would not be ubiquitous…" should be supported with facts, rather than made as a general statement of fact. For instance: "Native plant communities would benefit from non-grazing… (all native plant communities?); and, could likely maintain or expand their range… (all native plant communities?)."
25.	5.1.8	Pg. 5-57; lines 37- 40	Same objections as the comment directly above (comment #3).
26.	5.1.8	Pg. 5-58; lines 27-30	Same objections as the comments directly above (comments #3 & #4)
27.	5.1.8	Pg 59 Line 1	The state's plan does not intend to impact permitted use and its decline. It also does not intend to restrict range improvements if proven to be mutually beneficial to both livestock and wildlife.
28.	5.1.8	Pg 59 Lines 10-11	These lines should be deleted. Adaptability and flexibility are promoted in the state plan to avoid issues addressed in these 2 sentences.
29.	5.1.8	Pg 59 Lines 15-17	While this is true, livestock would be impacted by the actual footprint of disturbance from these activities unlike wildlife that may require significant buffers from anthropogenic structures and disturbances. The plan does not, in all cases, require that surface disturbances occur in non-habitat areas.
30.	5.1.9	Pg 60 Line 23	The state's plan calls for the maintenance of AML in HMAs throughout SGMAs. It also calls for potential modification of LUPs and RMPs to reduce or avoid negative impacts to GSG. It also acknowledges that potential conflict may exist between the existing Wild and Free Roaming Horse and Burro Act and the Endangered Species Act.
31.	5.1.12	5-63 line 8-9	Alt E does not manage through PPH and does not propose that all PPH be withdrawn from mineral entry. Please remove Alt E from this sentence.
32.	5.1.12	5-65 line 30-32	Alt E does not propose a validity exam. This is for Alt B. Remove this sentence from this section.

CHAPTER 5-CUMMULATIVE EFFECTS
COMMENT MATRIX

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT **Date: 6/28/2013**

Cmt #	Section	Line	Comment
33.	5.1.14	Pg 5-71; lines 23-32	We agree with the BLM's conclusions in this section, particularly that this is the one section that accurately identifies Alt E's avoidance policy in Occupied, Suitable, and Potential habitat as equivalent to ROW avoidance. The BLM should go back to the Lands and Realty and Renewable Energy sections in the Environmental Consequences chapter and make sure that this is reflected and analyzed consistently throughout the document.
34.	5.1.15	Pg 5-74; lines 37-39	We disagree with the conclusion that management under Alt E would result in the same impacts as Alt A. For this analysis that writers states impacts on renewable energy are dependent on the number of acres managed as ROW exclusion or avoidance. While Alt E does not specifically use the terms "ROW exclusion" and "ROW avoidance", we argue that the policy of "**avoid**, minimize, mitigate" is equivalent to the designation of "ROW **avoidance**".
35.	5.1.16	Pg 75 Lines 17-18	It's reasonable to assume that existing trails and roads would continue to be utilized, but that any new disturbance would be addressed by the 'no net loss' and 'avoid, minimize, mitigate' restrictions in the state plan.
36.	5.1.17	Pg 5-76; lines 2-4	We disagree with the BLM's conclusion that Alt E has fewer restrictions on activities such as mineral development and would therefore result in greater impacts on recreation. It is faulty logic to conclude that just because Alt E does not specify ROW exclusion or closures to mineral development that it would result in greater impacts. Any development that could not be avoided would be required to minimize and mitigate its impacts. As a result, there would be a no net loss of sage-grouse habitat. Therefore, the impacts on recreation would be neutral.
37.	5.1.19	Pg 79 Line 27	A distinction should also be made that while some flexibility may be reduced and management costs may increase in the short term, it is likely that over the longer term forage conditions, productivity, and quality of forage may be improved through efforts to restore and improve sites within SGMAs and those lost to fire and invasive or noxious plants.
38.	5.1.19	Pg 79 Line 36	All counties in Nevada that could be affected by grazing reductions, ranching, etc. should be included regardless of whether or not grazing is the most important economically. While grazing may be most important in the 3 listed counties, some areas affected within those counties may contain a much lower density of sagebrush habitat. Other counties could be much more significantly impacted by a higher loss of production in the livestock industry.
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CHAPTER 6, 7, 8-
COMMENT MATRIX

Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT Date: 6/28/2013

Cmt #	Chapter	Section/Line	Comment
1.	6	Page 6-3	Identify the Nevada "Department" of Wildlife correctly in the table under State agencies. It is not a Division
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Cooperating Agency: State of Nevada – DCNR, NDOW, NDOT **Date: June 28, 2013**

Cmt #	Section	Line	Comment
1.		Pg A-16; line 31	Appendix A, define "seasonal protection"
2.		Pgs A-16, 17,18	Repetition of bullet points on A-16, A-17, and A-18
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STATE OF NEVADA
Sagebrush Ecosystem Program

January 24, 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) appreciates the opportunity to participate in the review of the above mentioned document. This effort by the Bureau of Land Management (BLM) and United States Forest Service (USFS) represents an unparalleled planning effort to achieve sage-grouse conservation in our state, which complements the efforts of Nevada. The SEC also appreciates the continued close coordination between your staff and the Sagebrush Ecosystem Technical Team (SETT).

The SEC would like to reiterate, through the authority granted us in AB461 (2013 Legislative Session), it is our desire for the State's Alternative (Alternative E) to be selected as the BLM's preferred alternative. Any management alternative as a whole, or components of such, that are inconsistent with the state plan or other plans, policies, controls, or laws of the state of Nevada and local government jurisdictions, must be reconciled as required by National Environmental Policy Act (NEPA), Federal Land Policy Management Act (FLPMA), and respective regulations. The 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 has 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 Draft EIS (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, and 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, and Alternative E, 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 staff. Please continue to work with them to incorporate these revisions into the Final EIS.

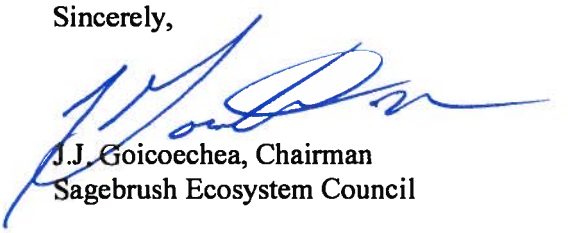
The SEC strongly supports the concept of multiple-use on public lands and is opposed to alternatives that partly or wholly eliminate land uses. Federal law specifically allows certain uses (e.g. grazing, mining, wild horses, and renewable energy) which must be recognized in the selection of the preferred alternative.

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 their 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 staff members to incorporate these revisions into the Final EIS.

In addition the SETT, on behalf of 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 regarding this matter. If you have any questions concerning 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
General Comment				While the agencies claim that the DEIS recognizes valid existing rights, the management restrictions for sage-grouse could wholly or partially deny mining operators their rights. The disturbance cap concept proposed in Alternatives B, C, and F in the DEIS could result in the denial of projects simply because other disturbances have decreased available cap space. The BLM has no authority to deny valid existing rights; consequently, decisions and development made by entities with valid existing rights would affect what the BLM can authorize for subsequent users of land it administers in the management zone. By using the cap concept, BLM may uphold the valid existing rights of one operator at the expense of another. BLM cannot unilaterally modify existing claims or access to claims after the claims have been issued.
General Commnet: Livestock Grazing				See Attachment A: Sagebrush Ecosystem Council (SEC) Comments on Livestock Grazing
General Commnet: Predation and Predator Control				See Attachment B: Sagebrush Ecosystem Council (SEC) Comments on Predation & Predator Control
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"

Nevada and Northeastern California Greater Sage-Grouse Draft LUPA and EIS
Sagebrush Ecosystem Program Comments

Ch/ App	Section	Page #	Text Referencing	Comment
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 GRSG 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 GRSG 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.
1	1.7.6	1-26 (26)	Memorandums of Understanding	" Juniper-Pinyon Partnership Project" should be rewritten as "Pinyon-Juniper Partnership Project"

Ch/ App	Section	Page #	Text Referencing	Comment
1	1.6	1-20 (20)	Development of Planning Criteria, last bullet item on the page	All discussions of multiple-use seem moot when put in the context of "For Forest Service-administered lands, all activities within GRSG habitat will achieve the GRSG habitat objectives." It is very easy to conceive of situations where a proposed action could be denied because of potential impacts to sage-grouse or sage-grouse habitat based on this statement. This does not conform to multiple-use management.
1	1.5.4	1-17 (17)	Issues Eliminated from Detailed Analysis Because They Are Beyond the Scope of the LUPAs:	There are issues which are out of the scope of what the BLM and Forest Service have authority to regulate on public lands, but these are not necessarily irrelevant to the DEIS analysis. All factors (indirect, direct, and cumulative) that impact sage-grouse should be analyzed, or at least included, so it is clear to the public (and the agencies) what the significant factors are that are contributing to the decline of sage-grouse populations. This would put the various alternative action items (elements) into perspective as to how important a specific element is to stopping the decline of the species. Only when that entire spectrum of factors per NEPA is analyzed can the public (and the agencies) determine if the eventual selected alternative is sufficient to stem the decline in sage-grouse populations. While it is understood that hunting is regulated by the state, to the above end, hunting should be analyzed further within the EIS. In addition the socioeconomic impacts of hunting should be evaluated in Section 3.23 Socioeconomics and Environmental Justice. Following are citations that should be reviewed and included in an analysis of hunting: Connelly et al. (2000a, b); Connelly et al. (2011); Gibson et al. (2011); Sedinger et al. (2010)
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.

Ch/ App	Section	Page #	Text Referencing	Comment
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 permitee 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 permitees 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 permittes 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.
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?

Ch/ App	Section	Page #	Text Referencing	Comment
2	2.8.2	2-181 (213)	Table 2.5; Action F-FFM-HFM 25	Does this action really propose constructing livestock exclosures (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.

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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 PGMAs. 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-	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	2.9	2-332 (364)	Alternative E	Replace "…Mitigation Bank Program." with " ...Conservation Credit System." This is found in the first sentence in column labled 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.

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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	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.

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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	2.8.2	2-123 (155)	Table 2.5; Action E-SSS 3: TMA 9.4	The State of Nevada currently has 5,000 raven take permits allocated anually, 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	2.8.2	2-134 (166)	Table 2.5; Action E-SSS-MIT 1: PMA-3	The phrases "Mitigation Bank Program" and "central mitigation bank" to be replaced with "Conservation Credit System"
2	2.8.2	2-137 (169)	Table 2.5; Alternative E; TMA-21.1	The phrases "Mitigation Bank Program" and "central mitigation bank" to be replaced with "Conservation Credit System"
2	2.8.2	2-142 (174)	Table 2.5; Action E-SSS-ACDM 4	Change third bullet point from "...Mitigation Bank Program." to "...Conservation Credit System."
2	2.8.2	2-144 (176)	Table 2.5; Alternative E	Change second bullet point wording that currently reads as "...Mitigation Bank Program (PMA-3)..." to "...Conservation Credit System (PMA-3)..."
2	2.8.2	2-146 (178)	Table 2.5; Alternative E	At the top of the column, replace "Mitigation Bank Program" with "Conservation Credit System"
2	2.8.2	2-152 (184)	Table 2.5; 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,…"
2	2.8.2 Table 2.4	2-66 (98)	Objective D-VEG 1 and Objective D-LG 2	Some plants that sage grouse use in riparian and other habitats are not native. “consistent with potential” may be misconstrued to not allow management favoring those plants even if they would support PFC or rangeland health goals.

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2	2.8.2 Table 2.4	2-80 (112)	Objective E-LG 2: TMA-12.2	This provides an appropriate focus on a mix or range management tools as recommended in Wyman et al (2006) and Swanson et al. (accepted).
2	2.8.2 Table 2.5	2-127 (159)	Action C-VEG 12	Removal of livestock watering infrastructure removes tools that are essential for watering livestock in a manner that supports the more powerful tools in grazing management, season of use, duration of use, rotation of use. Furthermore, it would cause livestock and wildlife like elk to concentrate use in riparian areas.
2	2.8.2 Table 2.5	2-132 (164)	Action D-VEG 23	Riparian areas serve as fuel breaks in some areas and they do so better when functioning properly. However adjacent terrace and valley bottom vegetation management could enhance this while fostering resilience.
2	2.8.2 Table 2.5	2-133 (165)	Action D-VEG 26	"Ecological integrity" is a bit vague or too specific depending on how it is interpreted. Functionality is the foundation. Then resource objectives should be based on local planning.
2	2.8.2 Table 2.5	2-134 (166)	Action D-VEG 28	Fuels treatments for shrubs is important and useful. Also include trees, specifically P/J, and other plants.
2	2.8.2 Table 2.5	2-152 (184)	Action B-WHB 4, Action B-LG 4, Action D-LG 4	If land health assessments includes Riparian PFC, this should be specified (e.g. Rangeland Health and Riparian PFC).
2	2.8.2 Table 2.5	2-196 (228)	Action D-LG 4, Action B-LG-5	Land health assessments are an excellent way to triage the management area and assess needs for management. Then management objectives for specific locations should be monitored with quantitative monitoring. See Swanson et al. (2006) and Dickard et al. (2014).
2	2.8.2 Table 2.5	2-200 (232	Action B-LG 10, Action D-LG 10, Action E-LG 10: TMA-12.2	It would be ideal for the public and the resource if the BLM and FS were on the same page and used PFC. Perhaps this is the means to do so.
2	2.8.2 Table 2.5	2-201 (233)	Action B-LG 12	Reference state vegetation may or may not be a useful goal or action. PFC is needed everywhere. Often PFC will move toward reference state vegetation. However PFC puts the emphasis on the physical functions as these are essential.

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2	2.8.2 Table 2.5	2-201 (233)	Action B-LG 13	Reducing hot season is very important where hot season grazing is the issue, as it often is. However, reducing hot season grazing is not needed everywhere. In some areas it is reduced enough already and in others there are other tools that are as or more useful for reducing negative impacts. Management should be site specific to meet objectives using all or any useful tools.
2	2.8.2 Table 2.5	2-202 (234)	Action F-LG 15	This puts continuity of riparian areas above all else which may not be optimal.
2	2.8.2 Table 2.5	2-206 (238)	Action D-LG 20	Sometimes it is not feasible or desired to move salting and supplemental feeding locations, livestock watering and handling facilities at least one half mile from a riparian area (e.g. in a riparian pasture small enough to preclude it).

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2	2.8.2; Table 2.7	2-324 (356)	Table 2.7 (1 of 3)	(1 of 3) Focusing management on allowable use levels where not meeting objectives is putting the emphasis of grazing management on a weak tool. It also focuses management on grazing where grazing may or may not be the driving management problem or opportunity (If this is not so, the caption needs to be changed). Most of the habitat objective issues identified in Table 2.6 (or its revised version) are not caused by current grazing management. Many of the habitat objectives identified in table 2.6 are caused by an inappropriate fire regime. Many that were caused by grazing will not be remedied by simply fixing grazing. As Wyman et al. (2006) and Swanson et al. (accepted) point out, utilization is important in places where the seasons of use are relatively long. However, utilization is much less important in riparian area management where grazing seasons are short and allow substantial parts of the growing season for plant recovery through growth or regrowth. Furthermore, requiring utilization levels such as these demotivates ranchers and range management specialists to find solutions that will work much more effectively. Those solutions, taught in the interagency (including Cooperative Extension, NRCS, BLM and FS) Nevada Range Management School, focus grazing management on season of use, duration of use, and rotation of use. This is especially true in large pastures (which were not the focus of Briske et al. (2008)). The terms and conditions column suggests that agencies will have people out monitoring in mid-season and this has repeatedly not worked. Where utilization is needed because of longer grazing seasons, a better approach is to have triggers followed up by end point indicators.

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2	2.8.2; Table 2.7	2-324 (356)	Table 2.7 comment continued (2 of 3)	(2 of 3) Both were described in the Nevada Rangeland Monitoring Handbook (Swanson et al. 2006) adopted by both BLM and FS by publicly signing the letter of support at the 2007 SRM ceremony. Both should be based on local considerations including season and duration of grazing, objectives, vegetation type, the amount of rest built into the system etc. If the intent of this Table 2.7 approach is to provide incentives to have grazing make progress toward objectives, then the approach should be targeted at only those objectives for which grazing is relevant and where current or recent grazing management is the cause of the problem. Even then, an alternative more powerful strategy would strengthen the incentive as a tool for effecting progress. This more powerful strategy is avoid stressing the important forage plants by either A. Utilization levels such as those proposed OR B. Short use periods with no livestock grazing during substantial parts of the growing season and use periods at a different seasons in different years. "No grazing from May 15 to August 30 in brood rearing habitat" precludes important tools for improving brood rearing habitat. Grazing repeatedly in September is likely to do damage to the physical functioning of riparian areas. Grazing before May 15 may cause riparian areas to not be grazed, and some late spring to early summer grazing benefits sage grouse by managing forb phenology, nutritional value to chicks, and availability (Evans 1986).

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2	2.8.2; Table 2.7	2-324 (356)	Table 2.7 comment continued (3 of 3)	(3 of 3) The problem with grazing in riparian areas and wet meadows is not that sage grouse are directly impacted by cattle use at the time that sage grouse use these areas. The problem is that poor grazing management causes riparian areas to lose functionality and other resource values. To address this problem there are many tools. As described in Swanson et al. (accepted) the need is for more generally successful tools to be used than generally unsuccessful tools. On balance there must be more recovery than damage over the length of the grazing rotation cycle. This management must keep the plants healthy so they can have strong roots and go through succession toward more or an adequate amount of riparian stabilizers. Precluding grazing from May 15 to September 1 is very clearly overkill as demonstrated by the diversity of successful methods applied in the Elko District and elsewhere across the nation. Managing this problem with only utilization standards would be overkill (because it is often unneeded), distracting (because it emphasizes a weaker tool while other and better approaches lose focus from lack of assurance) and ineffective (because it has proven to not be effective in practice where agencies cannot afford the personnel to monitor adequately and lose budgets because the fights are unproductive). The policy needs flexibility to use strong tools and certainty that strong tools will be used. So far this Table 2.7 widely misses the mark. It will likely be the subject of numerous law suits and it is contrary to what has been taught in Nevada and across the West by the BLM/FS National Riparian Service Team and by the Nevada Range management School for more than a decade.
2	2.9	2-326 (358)	Alternative C	"Removal of fencing would reduce the potential of GRSG direct strikes but would increase negative impacts on brood rearing habitats from wild horses and burros having access to more riparian sites." This sentence is very important. Due to our Nation's inability to manage public horse populations, their sphere of influence must be limited to HMAs and fenced riparian pastures will be a critically important tool for Riparian management and PFC.

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2	2.9	2-327 (359)	Alternative E	Promotes riparian grazing improvements along with additional infrastructure in order to control season, duration and degree of use. These improvements would be beneficial to late summer brood-rearing habitat for GRSG. Another important sentence. Alternative E embraces more riparian management tools.
2	2.9	2-327-328 (359-360)	Alternative A	"Keeping horses and burros at AML would reduce overall impacts on vegetation, especially nesting cover and riparian brood-rearing habitats during periods of drought." At best, this is true only if keeping horses at AML can be done and only if AML is based on riparian PFC which it has not been until recently (after the 2010 policy). Consistently, AML has been not been met.
2	2.8.2 Table 2.5	General Comment	All Alternatives	Mowing of sagebrush areas is not mentioned in any alternative even though monitoring of existing mowed fuel breaks and habitat improvement projects has shown this tool to be highly effective in many areas and mowed fuel breaks may be a fundamentally important tool for reducing fire size and therefore average frequency (Swanson et al. 2013 and Swanson et al. accepted).
2	2.8.2 Table 2.4	2-72 (104)	Objective D-VEG-D 1	Although drought is well recognized as a stressful time for vegetation, the important consideration for vegetation is the survival of the perennial plants through the drought and their recovery after drought.

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2	2.8.2 Table 2.5	2-150 (182)	(1 of 2) Action D-VEG-D, Action D-VEG-D 3, Action D-LG 28	(1 of 2) Fortunately once a plant becomes dormant, little or no stress occurs from grazing the dormant leaves. Unfortunately, prior to dormancy, opportunities for recovery from grazing that depend on moisture availability are shortened. Riparian areas differ in their response to drought depending on whether surface water and ground water remains and for how long. Where surface water is absent, a pasture or use area a long distance from water may receive little or no livestock use. This allows water loving plants to grow toward the center of, and help restore, an over-widened channel so long as there is subsurface water forplant growth. Where surface water is limited, the use near the remaining water may be excessive. This prevents the drought opportunity for plant encroachment on an over-widened stream to narrow a stream. Animals also seek the green forage remaining in riparian areas with subsurface moisture. Because the amount of water can vary within and among seasons with or without drought, it is more important to have recovery periods built in to the grazing plan than to attempt to regulate the amount of use during a grazing event (an important weakness of table 2.7). With a short season of use, plants can recover on average through the years. With long seasons of use riparian plants in large pastures do not get sufficient recovery periods without rest years. Rest years can create fuels issues that could be avoided or lessened with short duration use.
2	2.8.2 Table 2.5	2-150 (182)	(2 of 2) Action D-VEG-D, Action D-VEG-D 3, Action D-LG 28 continued	(2 of 2) Following drought, perennial plants can benefit from a period of growth with little or short growing season grazing. For this reason it is important to move the season of use among years so that in some years plants have the needed opportunity to recover even if it is shortened in other years and to shorten the use periods. Shortening use periods often requires water development for larger herds in smaller areas (with fewer locations for watering) for a shorter time.

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2	2.9	2-327-328 (359-360)	Alternative A; "Keeping horses and burros at AML would reduce overall impacts on vegetation, especially nesting cover and riparian brood-rearing habitats during periods of drought."	Interesting word choice (would) as it has not been sustained across the planning area yet. This statement is true only if "impacts on vegetation, especially nesting cover and riparian brood-rearing habitats" are considered in setting AML. Riparian conditions were not considered until 2010. So, many AML decisions will likely have to be remade to make this statement true.
2	2.9	2-330-331 (362-363)	(1 of 2) Alternative D; Grazing management to achieve vegetation composition and structure consistent with ecological site potential could maintain or enhance sagebrush and perennial grass conditions within PPMAs. Drought management and livestock resting during the growing season would provide a more resilient plant community	(1 of 2) The bigger problem than drought is the overabundance of forage/fuel in years after wet winters and springs. The biggest issue facing sagebrush habitats is not drought, but fire fueled by weather variability. Drought NEPA documents were a partially good idea that missed the bigger part of the issue. The more important question not addressed in any alternative is how to manage the forage/fuel opportunity/crisis after years like 1983-84 that preceded the big fire year of 1985 or the 1993 year that preceded the big fire year of 1995 or the 1995,6,7,8 wet years that preceded the huge fire years of 1999, 2000, 2001. Statistically the big fire years in the Southwest come the year after the wet years (Knapp 1995). Although they can come in the wet year after things dry up as in 2006. It is absolutely critical that this EIS empower districts to develop criteria based authority to issue TNR, stewardship contracting, or other grazing authority for livestock to consume these fuels after wet years and to do so in a manner that sustains the long term health of the herbaceous perennials and prevents the huge fires that consume sagebrush over vast areas. TNR is probably the easiest and brings in some additional revenue. Unfortunately it is less likely to be applied with finesse. Stewardship contracting could trade the grazing fee for a much greater economic benefit to the government by contracting for grazed fuel breaks in strategic areas to break up fuel continuity or protect critical habitats. Fall grazing of cheatgrass has been shown at the Gund Ranch to be a very effective way to use grazing to consume cheatgrass fuels in a manner that does not damage perennial plants (Smeltzer et al. accepted).

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2	2.9	2-330-331 (362-363)	(2 of 2) Alternative D; Grazing management to achieve vegetation composition and structure consistent with ecological site potential could maintain or enhance sagebrush and perennial grass conditions within PPMAs. Drought management and livestock resting during the growing season would provide a more resilient plant community	(2 of 2) This tool can be expanded with adaptive management to include more of a focus on using protein supplements or hauled water to concentrate grazing along fences. Winter grazing can be applied in areas without snow. Low stress livestock handling could be applied to concentrate cattle for fuel breaks across large landscapes. In addition strategic and targeted grazing can be used as a tool to reduce fine fuel loads and create and maintain greenstrips. For example, Carson City has worked with a regional sheep producer to reduce fine fuels (cheatgrass, perennial bunch grasses, etc.) along the wildland urban interface located west of the city. Work was initiated in 1999 (Smith and Davison 1999) and grazing has occurred annually since 2006. This process creates a green strip between the wildland and the urban interface and can adapted for maintenance of green strips in sagebrush habitat. Any approach that works will have to provide economic and/or other incentives to producers to stock up or man up with the extra labor to put practices on the ground. They will also require monitoring to learn from the experience. The alternative of large fires that could easily have been prevented or shrunk is unacceptable. Not using this opportunity to create empowering NEPA documents ahead of the need, and therefore forcing such documents to be produced during the need which is not possible, is equally unacceptable.
2	2.8.2	2-254 (286)	Table 2.5; Action B-LOC 1; 1st bullet	Proposed withdrawal from mineral entry based on risk to sage-grouse and its habitat is not necessary as this action does not allow for avoidance, minimization of impacts, and mitigation of impacts within the designated areas (i.e., PPH, PPMAs, etc.). The approach of avoiding, minimizing, and mitigating impacts is preferable to withdrawal from mineral entry. The approaches outlined in Alternatives D and E are preferable to withdrawal from mineral entry.

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2	2.8.2	2-256 (288)	Table 2.5; Action B-LOC 2	The mandatory application of BMPs from the NTT Report should not be considered. BMPs should be applied on a case-by-case basis, as relevant to the action being considered. These types of "one-size-fits-all" regulatory prescriptions are contrary to DOI and BLM guidelines on the Data Quality Act."
2	2.8.2	2-205 (237) and 2-207 (239)	Table 2.5; Page 205, Alternative B and F, Action B-LG 19 and F-LG 19 and Page 207, Alternative B Action B-LG 23 and Alternative F Action F-LG23	The option of re-opening grazing privileges if a new permittee acquires a ranch/allotment where grazing privileges have been retired should be considered. This action element is based on the assumption that grazing is always negative with respect to impacts to sage-grouse and their habitat. Voluntary retirement of grazing privileges by one operator may not be economical or environmentally viable for the next operator. In addition, these areas should not be "retired" but be put in voluntary non-use status so they can be re-opened to grazing at a later date. These areas may provide important livestock grazing in years of drought when livestock are moved out of other pasture early, or may provide grazing lands for permittees when wildfire has resulted in closure of other pastures, either associated with the allotment or from neighboring allotments.

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2	2.8.2	2-194 - 2-214 (226 - 246)	Table 2.5; Livestock Grazing Actions	There is no mention of utilizing Temporary Non-Renewable (TNR) authorizations to assist in addressing the threats of catastrophic wildfire, the establishment of green belts, the protection of in-tact sagebrush communities, and the potential to control the spread of invasive annual grasses, especially in years in which we receive average to above average annual precipitation. We would recommend the adoption of the following language in the analyzed actions to address the utility of TNR to achieve this objective through a NEPA process in advance of the need to use such TNR's. "To reduce the risk of fire and enhance restoration in large contiguous blocks of cheatgrass-dominated landscapes or sage-grouse habitats that are next to cheatgrass dominated lands, create local NEPA documented plans to use dormant season temporary nonrenewable (TNR) AUM authorizations and stewardship contracted grazing to reduce fuels in areas dominated by invasives."
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.
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.

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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)
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 PGMAs) for new recreational facilities, utility-scale wind and solar energy facilitates, salable mineral development, and non-energy leasing minerals. This is an inconsistency that BLM should consider when selecting their preferred plan.
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.

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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.
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 respectively 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.

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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.
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.

Ch/ App	Section	Page #	Text Referencing	Comment
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).
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 *less* 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 *could* be requested and under Alternative E is states that mitigation *would* be requested for locatable minerals. Please clarify the distinction between alternatives. In this instance Alternative E would be stronger than Alternative D.

Ch/ App	Section	Page #	Text Referencing	Comment
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.
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.

Ch/ App	Section	Page #	Text Referencing	Comment
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.
4	4.3.1	4-13 (605)	Third bullet. (VDDT is first presented in Chapter 3 p 3-26 but provides no real explaination.)	I was unable to find detailed methods and output on the VDDT modeling. As this modeling effort is critical to the analysis and conculsions 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 conculsions were reached.

Ch/ App	Section	Page #	Text Referencing	Comment
4	General Comment			This very qualitative discussion of impacts would be unacceptable to the BLM if it was in an EIS written by a third-party contractor as a project component. The qualitative treatment of impacts as "more than," "less than," "increase," "decrease," and etc. is not sufficient to allow the public (or the authorized officer) to determine real impacts and the magnitude of the impacts. The only quantitative data presented are acres of sage-grouse habitats open to various land uses among the alternatives, or acreages of allotments within sage-grouse habitat, etc. There must be some quantification to create meaning and to allow the public to discern differences between alternatives.
4	4.14.2	4-188 (780)	Loctable Minerals section - General	The analysis of impacts to locatable minerals is predicated on how many acres of public land will be withdrawn from mineral entry. The alternatives have various restrictions placed on mineral activity and these are not analyzed or compared. The "Indicators" provided on page 188 are related to actions that will increase or decrease the acreage of mineral withdrawal, and the "actions placing restrictions or requirements that reduce efficiency and increase operational costs that could make development infeasible." Yet in the analysis, these restrictions are generally dismissed. The analysis is inadequate.
4	4.19.2	4-245 (837)	Economic Impacts section	The analysis presented here is simplistic and an overly optimistic analysis. This analysis is woefully incomplete and inadequate. The economic impacts of Alternatives C, D, and E are exactly the same and not different than Alternative A (No Action). A review of Table 2.5., Description of Alternative Actions, reveals that there are substantial differences in the Alternatives with respect to Locatable Minerals, and therefore, impacts should be different. This demonstrates that the qualitative analysis done in this DEIS is not adequate to allow the public to discern the real difference among alternatives.

Ch/ App	Section	Page #	Text Referencing	Comment
5	General Comment			This very qualitative discussion of impacts is inadaquate. The qualitative treatment of impacts as “more than,” “less than,” “increase,” “decrease,” etc. is not sufficient to allow the public (or the authorized officer) to determine real impacts and the magnitude of the impacts. This is common for every resource program analyzed. The cumulative effects analysis for Climate Change is quite general. What is the basis for the analysis (no references are included)? It is questionable if the analysis is complete or accurate.
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."
H		H-1 - H-6	Oil and Gas Reasonably Foreseeable Development Scenario	Appendix H specifically references oil and gas activities in the Assumptions for the Reasonably Foreseeable Development Scenario; however; the assumptions are not in agreement with the information industry has submitted to Elko District as part of two proposed actions and the public record. This should be corrected in the FEIS.
O		O-1 - O-6	Economic Impact Analysis Methodology	As indicated above, the assumptions used on Appendix H are incorrect and gas economic value is not accurate and significantly undervalued. This analysis should utilize the information in the public record in order to accurately analysis the positive economic value of reasonable and foreseeable development.

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Attachment A:
Sagebrush Ecosystem Council (SEC) Comments on Predation & Predator Control

The Sagebrush Ecosystem Council (SEC) understands the federal land management agencies have decided that, since predator control is "outside the scope of the plan amendment" (see Executive Summary, *p. xvii* and Chapter 1, p. 18), it would not be addressed in the DEIS. However, consulting the BLM Handbook H1790-1 (NEPA Handbook), this issue seems to fall readily "within scope" under the two bullets on page 41. That language is displayed below, verbatim in *Tahoma font and italicized:*

6.4.1 Identifying Issues for Analysis

Preliminary issues are frequently identified during the development of the proposed action through internal and external scoping. Additionally, supplemental authorities that provide procedural or substantive responsibilities relevant to the NEPA process may help identify issues for analysis. See Appendix 1, Supplemental Authorities to Be Considered, for a list of some common supplemental authorities. There is no need to make negative declarations regarding resources described in supplemental authorities that are not relevant to your proposal at hand.

While many issues may arise during scoping, not all of the issues raised warrant analysis in an EA or EIS. Analyze issues raised through scoping if:

• Analysis of the issue is necessary to make a reasoned choice between alternatives. That is, does it relate to how the proposed action or alternatives respond to the purpose and need? (See section 6.6, Alternatives Development).

• The issue is significant (an issue associated with a significant direct, indirect, or cumulative impact, or where analysis is necessary to determine the significance of impacts).

When identifying issues to be analyzed, it is helpful to ask, "Is there disagreement about the best way to use a resource, or resolve an unwanted resource condition, or potentially significant effects of a proposed action or alternative?" If the answer is "yes," you may benefit from subjecting the issue to analysis.

It can be demonstrably argued that predation, previously identified as a USFWS-identified threat (Chapter 2, Table 2.1, p. 11) is a significant issue (see following paragraphs) and that analysis of this issue is necessary to make a reasoned choice between alternatives (bullet 1 above), especially since the State's Alternative (Alternative E) includes scientifically-based predator control. Predation and predator control are arguably considered by many to be significant issues, i.e., issues associated with a significant direct, indirect, or cumulative impact, or where analysis is necessary to determine the significance of impacts (bullet 2 above). **Therefore, based on guidelines of the BLM NEPA Handbook, it seems that the BLM has at least the option if not the obligation/requirement to analyze predation even though ravens (a primary sage-grouse predator) are under the authority of the USFWS and most other predators are managed by NDOW. The SEC also maintains that omission of predator control from the**

analysis would be viewed as a liability in the court of public opinion, and as such would detract from the credibility of the EIS document.

Based on a literature review by Manier et al. (2013), the impacts of predation on sage-grouse are variable. However, there seems to be general agreement in the scientific literature that anthropogenic subsidies have resulted in an increase in the numbers of some predators, especially red fox and ravens. As an example, Coates and Delahanty (2010) indicated that raven numbers have increased by 600% or more since the 1960s and that ravens are a primary nest predator. High predator numbers can negatively affect sage-grouse productivity in other ways than just direct mortality, with harassment reducing the time female grouse would otherwise devote to incubation (Coates 2007). In areas that are fragmented and/or have inadequate herbaceous cover, predation impacts are likely to be higher.

The literature also shows that predation may be limiting in some situations (Connelly et al. 2004; Coates et al. 2008), and that indeed predation is the primary cause of mortality in some areas, accounting for 90% of all mortality during a multi-year study in central Nevada (Blomberg et al. 2014). Although predator control can be modestly effective (Baxter et al. 2013), the authors warned that predator control should be approached cautiously. Predator numbers can rebound quickly without continual control (Coates 2007; Hagen 2011). Nevertheless, Manier et al. (2013, p.115) concluded that predator control (removal) "may be warranted in areas with low habitat quality (that is, heavily fragmented areas of high anthropogenic disturbance) supporting inflated numbers of synanthropic predators…" Similarly, the COT report (USFWS 2013, p. 11) states that predator management has been effective on local scales for short periods, but its efficacy over broad ranges or over long time spans has not been demonstrated (Hagen 2011). **In areas of compromised habitats and high populations of synanthropic predators, predator control may be effective to ensure sage-grouse persistence until habitat conditions improve (USFWS 2013).**

The SEC recommends that scientifically-based predator control should be considered, especially in areas of critical sage-grouse habitat, for the following reasons: (1) restoration of sagebrush habitat is a slow process, with disturbed areas requiring 25 – 100 years to rebound (Baker 2011); and (2) population recovery of sage-grouse may be relatively slow even if environmental and habitat conditions improve (Connelly and Braun 1997). Predator control may be considered a tourniquet that is applied concurrently while habitat restoration or enhancement is in progress. **Predator control implemented concurrently with habitat restoration seems wise since the SEC has been asked repeatedly by the USFWS to recommend actions that would "stop the bleeding" (i.e., the decline of both sage-grouse population numbers and habitat).**

The EIS emphasizes reduction of anthropogenic subsidies that provide artificial nest sites, hunting perches, and food sources. The SEC is fully supportive of these measures, but time is of the essence. It defies both scientific logic and common sense that we would not implement at least site-specific control for ravens concurrently with attempts to restore sage-grouse habitat and mitigate man-caused subsidies for ravens. The SEC is also keenly aware of the challenge to implement meaningful raven control because of the protection this species receives under the

Migratory Bird Treaty Act. However, permits to "take" ravens can and are being issued, so this challenge can be addressed.

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Attachment B:
Sagebrush Ecosystem Council (SEC) Comments on Livestock Grazing

The Sagebrush Ecosystem Council (SEC) views the analysis of livestock grazing management in the DEIS as seriously flawed. Whereas the document includes, for the most part, excellent wildlife science supported by appropriate references, much of the pertinent literature regarding livestock grazing is simply missing. The inclusion of pertinent scientific literature citations in this DEIS, a document of significant importance to the citizens of Nevada and northern California, is absolutely essential to enable a relationship of trust required for successful collaborative partnerships focused on maintaining and enhancing habitat for the greater sage-grouse.

Detailed below are important references missing from the DEIS. In particular, the document lacks pertinent citations on livestock grazing management as related to the functionality and sustainability of sagebrush/perennial herbaceous plant communities and meadows within the sagebrush ecosystem. Regarding the first point, repeated statements throughout the document infer or directly indicate that grazing can have adverse impacts on herbaceous vegetation and, by implication, sage-grouse. The SEC is in complete agreement that heavy or abusive livestock grazing negatively impacts sage-grouse habitat. However, in the DEIS, even when the merits of managed/proper/moderate grazing are mentioned, supporting scientific references are often missing, even though they are available in the scientific literature. This substantially weakens the case for proper grazing management.

Specific and obvious examples of missing references are papers by Davies et al. 2009 and Davies et al. 2010, both of which demonstrated through field research that moderate levels of grazing can increase the resiliency of sagebrush habitats, reduce the risk and severity of wildfire, and decrease the risk of exotic weed invasion. Exclusion of livestock and implementation of moderate grazing over a >70 year period in sagebrush steppe plant communities resulted in essentially the same plant community, other than a buildup of fine fuels in the non-grazed areas (Davies et al. 2009). In the absence of fire, well-managed livestock grazing and long-term grazing exclusion produced similar plant community composition, productivity, and densities. Similarly, Courtois et al. (2006, p. 574) indicated that, for 16 Nevada sites (13 of which were sagebrush communities), “Few changes in species composition, cover, density, and production inside and outside exclosures have occurred in 65 years, indicating that recovery rates since pre-Taylor Grazing Act conditions were similar under moderate grazing and grazing exclusion…”

Davies et al. (2009 and 2010) also found that long-term rest increases the likelihood of fire-induced mortality of perennial bunchgrasses because more fuel resides on the root crown of perennial bunchgrasses and that post-fire exotic annual grass invasion was greater in sagebrush plant communities where livestock grazing had been excluded for more than half a century compared to moderately grazed areas.

In another paper, **Davies et al. (2011, p. 2575) concluded based on literature review that “Though appropriately managed grazing is critical to protecting the sagebrush ecosystem, livestock grazing per se is not a stressor threatening the sustainability of the ecosystem.**

Thus, cessation of livestock grazing will not conserve the sagebrush ecosystem." Although these authors were not addressing sage-grouse habitat per se, it is obvious that the sustainability and conservation of the ecosystem are necessary to provide resistance to weed invasion and resilience after disturbance (McAdoo et al. 2013) that in turn provide sage-grouse habitat across landscapes and over time (Miller and Eddleman 2001). The paper by Davies et al. (2011) is cited in the DEIS, but only within Table 2.4, for Alternative B, pp. 174 and 204, with regard to strategically grazing fine fuels and grazing seedings as a component of a grazing system. Four of the paper's six authors are prominent range scientists and the other two are prominent sage-grouse researchers.

A "hot off the press" review paper by Svejcar et al. (2014), not available when the DEIS was being written, acknowledges that "Because grazing is a complex ecological process, synthesis of scientific literature can be a challenge." The authors (27 prominent range scientists from 10 western states) also opine that "Legacy effects of uncontrolled grazing during the homestead era further complicate analysis of current grazing impacts…" The authors maintain that, although there are areas on the landscape where grazing impacts can be identified, there are also vast grazed areas where impacts are minimal. Over the last 20-50 years land managers have actively sought to bring populations of native and domestic herbivores in balance with the potential of vegetation and soils (Svejcar et al. 2014)

Regarding livestock grazing of meadows and riparian areas, the cautionary tone of the document is understandable, but great strides have been made in the last two decades to address grazing issues in these areas. That said, the use of livestock as a tool for meadow enhancement is documented in literature, but essentially ignored or mentioned without appropriate citations in the DEIS. As an example, Chapter 4, p. 83 includes the following statement that should be buttressed with literature citations: "Disturbance such as that created by livestock grazing may be required to increase forb diversity (note that forb diversity on meadows can increase with grazing)." **Studies by Neel (1980), Klebenow (1982), and Evans (1986) demonstrated that cattle grazing can be used to stimulate forb production. These studies were all conducted in Nevada, focusing on livestock use of upland meadows frequented by sage-grouse.** Also, in Chapter 4, p. 86, the following statement is very incomplete:

> "Long-term impacts of no grazing on riparian plant communities are less clear. Some studies show that plant productivity, especially in meadows, can decline over time in the absence of grazing (Bryant 1985). However, in a review of the literature on the subject, Belsky (1986) concluded that strong evidence for a positive relationship between herbivory and plant fitness is lacking (Belsky 1986). Thus, no livestock grazing would likely be positive to riparian areas and wetlands initially, but long-term impacts are less certain."

What the DEIS fails to mention is that Evans (1986) and Klebenow (1985, 2001) reported that sage-grouse use of moderately grazed meadows was higher than their use of both ungrazed meadows and heavily grazed meadows. Oakleaf (1971) acknowledged that grazing should be used as a tool for meadow enhancement, warning however that heavy grazing would be detrimental.

Other examples of pertinent grazing management literature missing from the DEIS are as follows: [Please note that this list is not yet complete]

Bates et al. 2009 – Concluded that properly applied livestock grazing after low severity prescribed fire will not hinder the recovery of herbaceous plant communities in Wyoming big sagebrush steppe.

Knopf 1996 - Season of grazing is more important than intensity of grazing. Late-season grazing on dormant vegetation has little effect on bird communities (Knopf 1996).

Johnson et al. 2011 - Moderate and low stocking rates of cattle grazing on bunchgrass communities in northeastern Oregon caused no negative impacts to ground-nesting songbirds. These stocking rates generally provided suitable habitat for all species studied and results were similar to the no grazing treatment.

Whitehurst and Marlow 2013 – In mountain big sagebrush habitat, higher forb nutrient density that is critical for pre-incubating sage-grouse hens and survival of young broods can be achieved with targeted cattle grazing and selective thinning of mature mountain big sagebrush stands.

West et al. 1984 - Found no significant increases in perennial grasses with long-term rest and cautioned managers that livestock exclusion will not result in a rapid improvement of native herbaceous component on sites dominated by woody vegetation.

Sneva et al. 1984 - Noted some slight increases in perennial grasses with thirty years of livestock exclusion in the sagebrush steppe, but this increase was less than what occurred on an adjacent grazed site, and after 35 years grass frequency had become slightly higher on the area outside the exclosure. The authors concluded that direct reductions in sagebrush would be required to greatly increase perennial grasses.

Holechek & Stephenson 1983 - Sagebrush communities in New Mexico rested for twenty-two years compared to moderately grazed areas had minimal vegetation differences and the differences that did occur included greater perennial grass cover in the grazed areas. This suggests that moderate grazing may have been beneficial. Thus, it remains unclear if long-term grazing rest will facilitate increases in the perennial herbaceous understory in communities with dense sagebrush overstories.

Laycock 1967 - found that fall grazing (with sheep) and grazing exclusion resulted in a 30% increase in production of perennial grasses and perennial forbs compared to spring use. In this case, a change in the timing of grazing had the same effect as the long-term exclusion of grazing.

In addition to pertinent grazing management literature that is missing in the DEIS, another concern is the inappropriate contextual interpretation of some cited literature. As a case in point, there is mention in Chapter 4, p. 15 that "livestock may also trample nests and disturb GRSG behavior (NTT 2001, p.14)." Certainly livestock may trample sage-grouse nests, but the magnitude of the issue is highly questionable. Reference is apparently to Beck and Mitchell 2000, which was cited in both the NTT report (NTT 2011) and the more recent USGS/BLM

report (Manier et al. 2013), which stated. **"…**sheep and cattle trampled nests and caused nest desertions (Beck and Mitchell, 2000)." The information in Beck and Mitchell was cited from a single article by Rasmussen and Griner 1938. Our search of this document showed that, of 41 nests impacted by various causes, 2 (4.9%) were destroyed by livestock, 23 by carnivores, 7 by ravens, 7 by undetermined causes, and 2 by human causes. This same study found 23 deserted nests, 5 (21.7%) of which were attributed to livestock. For proper context we must also acknowledge that ravens have increased dramatically since the 1930's, livestock numbers have decreased dramatically since the 1930's, and livestock grazing has changed from season/year-long to managed systems that defer or rest much of the landscape from grazing during the sage-grouse nesting season. For ground nesting birds in general, Schultz (2010), by way of literature review, concluded that there is "limited experimental science about the effect of livestock on nests and eggs and virtually none comes from sagebrush-grass plant communities. A review of published research suggests that while trampling is possible, the conditions under which it occurs probably are uncommon on the large grazing allotments that typify the low production western rangelands, composed of shrubs and perennial grasses."

A few more comments are also in order. Based on input from Dr. Sherm Swanson (UNR Range Ecologist), the DEIS focus on utilization, apparently as an objective in some cases, is largely in appropriate. Specifically in regard to Table 2.7, focusing management on allowable use levels where not meeting objectives is putting the emphasis of grazing management on a weak tool. It also focuses management on grazing where grazing may or may not be the driving management problem or opportunity (If this is not intended, the caption needs to be changed). Most of the habitat objective issues identified in Table 2.6 (or its revised version) are not caused by current grazing management. Many of the habitat objectives identified in table 2.6 are caused by an inappropriate fire regime. Many that were caused by grazing will not be remedied by simply fixing grazing. As Wyman et al. (2006) and Swanson et al. (accepted with revision 2014) point out, utilization is important in places where the seasons of use are relatively long. However, utilization is much less important in riparian area management if and where grazing seasons are short and allow substantial parts of the growing season for plant recovery through growth or regrowth. Furthermore, requiring utilization levels such as these de-motivates ranchers and range management specialists to find solutions that will work much more effectively. Those solutions, taught in the interagency Nevada Range Management School (led by Cooperative Extension, and including team members from the NRCS, BLM, USFS, EPA, and the ranching industry), are founded on plant growth science and grazing management based on season and duration of use (McAdoo et al. 2010). These management principles are especially appropriate for large pastures (which were not the focus of Briske et al. 2008) that are typical in sage grouse habitats.

The terms and conditions column suggests that agencies will have people out monitoring in mid-season and this has repeatedly not worked. Where utilization is needed because of longer grazing seasons, a better approach is to have triggers to help ranchers see when to move animals followed up by end point indicators for quantitative monitoring. Both were described in the Nevada Rangeland Monitoring Handbook (Swanson et al. 2006) adopted by the BLM and USFS, along with other state and federal agencies in 2007. Both should be based on local considerations

including season and duration of grazing, objectives, vegetation type, the amount of rest built into the system etc. If the intent of the Table 2.7 approach is to provide incentive to have grazing make progress toward objectives (if other grazing management can get to the objectives then grazing utilization can be more flexible), then the approach should be targeted at only those objectives for which grazing is relevant and where current or recent grazing management is the cause of the problem. Even then, an alternative more powerful strategy would strengthen the incentive as a tool for effecting progress. **This more powerful strategy is to avoid stressing the important forage plants by either: (1) Utilization levels such as those proposed OR (2) Short use periods with no livestock grazing during substantial parts of the growing season and use periods at different seasons in different years.** These ideas are taught in Range Management School and Cooperative Permittee Monitoring workshops around Nevada, using the Grazing Response Index (USDA USFS, 1996) described in the Nevada Ranchers' Monitoring Guide (Perryman et al. 2006).

Also, according to Dr. Swanson, the language "No grazing from May 15 to August 30 in brood rearing habitat" precludes important tools for improving brood rearing habitat. Grazing repeatedly in September is likely to damage the physical functioning of riparian areas, especially in large pastures with limited riparian waters/areas. Grazing before May 15 may cause riparian areas to not be grazed because upland forage is preferred then (Swanson et al (accepted with revisions 2014), and some late spring to early summer grazing benefits sage-grouse by managing forb phenology, nutritional value to chicks, and availability (Evans 1986). The problem with grazing in riparian areas and wet meadows is not that sage-grouse are directly impacted by cattle use at the time that sage-grouse use these areas. The problem is that poor grazing management causes riparian areas to lose functionality and other resource values. To address this problem there are many tools. As described in Swanson et al. (accepted with revision 2014), the need is for more generally successful tools to be used than generally unsuccessful tools. On balance there must be more recovery than damage over the length of the grazing rotation cycle. This management must keep the plants healthy so they can have strong roots and go through succession toward more riparian stabilizers or maintain an adequate amount of riparian stabilizers.

Precluding grazing from May 15 to September 1 is very clearly overkill as demonstrated by the diversity of successful methods applied in the Elko BLM District and elsewhere across the nation. Managing this problem with only utilization standards would be overkill (because it is often unneeded), distracting (because it emphasizes a weaker tool while other and better approaches lose focus from lack of assurance) and ineffective (because it has proven to not be effective in practice where agencies cannot afford the personnel to monitor adequately and then lose budgets because the fights are unproductive). The policy needs flexibility to use strong tools and certainty that strong tools will be used. So far this Table 2.7 widely misses the mark. It will likely be the subject of numerous law suits and it is contrary to what has been taught in Nevada and across the West by the BLM/FS National Riparian Service Team and by the Nevada Range Management School for almost a decade.

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NEVADA/NORTHEASTERN CALIFORNIA SUBREGION
GREATER SAGE-GROUSE PROPOSED PLAN (ALTERNATIVE G)

Cooperating Agency Review

How to Provide Meaningful Feedback

Commenting:

For each comment, please fill in information under the appropriate column heading in the comment matrix.

- ✓ **Your comments should be specific.** Please be clear, and concise, with exact wording changes stated.
- ✓ **Feel free to insert more rows if needed.**

Example Comment Table

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
1.	3-5	10-13	1	This is not a correct project description. Update this paragraph.
2.	3-76	2-4	Jane Doe	Same as Comment #1 2 3
3. 4	4-98	4-9	Tami Smith	This paragraph is misleading. Please replace the second sentence with the following: "These forms of surface disturbances promote erosion, which can degrade water quality."

	Error Description	Instructions to Avoid Common Error
1	Name of commenter was not provided.	All four cells in the row need to be completed by the commenter.
2	Commenter did not identify specific error(s) and did not provide the text to correct the error(s).	Comments must identify page and row/line number where change is needed and, if necessary, must provide the exact text that needs to be added to the document. Please be clear and directive with exact wording changes stated. Ambiguous comments, such as "What?," "Poor," or "Is this right?," are not helpful and will not be considered.
3	Commenter directed reviewer to another location in the table to resolve Comment #2.	If you have the same comment more than once, do not refer to another comment number. Instead, please repeat your comment by copying and pasting your comment into a new row in the table and provide the appropriate page number, etc.
4	None. This row is an example of a good comment and response.	

NEVADA/NORTHEASTERN CALIFORNIA SUBREGION
GREATER SAGE-GROUSE PROPOSED PLAN (ALTERNATIVE G)

Cooperating Agency Review

****Please review the Proposed Plan and provide your comments in the following Comment Matrix****

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
1.	2-1	8-12	SETT	A subset of the RDFs included as Appendix A of the DEIS have been incorporated into the body of this Draft Proposed Plan. Are these the only RDFs that BLM/USFS intends to include in the FEIS? If so the reasoning behind excluding a portion of the RDFs from the final plan is desired.
2.	2-1	13-14	SETT	The Sagebrush Ecosystem Program (SEP) is strongly opposed to a disturbance threshold cap as it will interfere with the effective implementation of the Conservation Credit System. In addition, this statement as written is unclear how this policy would be implemented. The 3% disturbance cap applies to what area – PMU, BSA, PAC? What happens when the threshold is reached? Is all development excluded and from what area? Will this apply to all land use, including locatable minerals? The SEP strongly urges BLM/ USFS to reconsider this policy
3.	2-3	Table 2.6: Nesting-Security	SETT	What is the definition of tall structures? This is leaving it open to interpretation and may lead to the policy being implemented wildly differently among different field office and districts. Also, how can BLM/ FS enforce a policy of no new tall structures within 3 miles of nesting habitat, when nesting habitat is currently not mapped? Is this meant to say none within 3 miles of a lek?
4.	2-4	10-11	SETT	In this sub-objective no net unmitigated loss is only applied to PPMA, while in Objective G-SSS 4 (lines 6-9) it is applied to both PPMA and PGMA. These objectives are in conflict with one another. If BLM/USFS only manages for no net unmitigated loss of PPMA, then would SETT Consultation, RDFs, the Conservation Credit System only apply to PPMA? If so, the SEP cannot support this. The SEP's objective is to achieve no net unmitigated loss to ALL sage-grouse habitat.

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
5.	2-4	26-30	SETT	Seasonal protection during the lekking period should be applied during lekking hours (1 hour before sunrise until 10:00am)
6.	2-5	1-4	SETT	In the Appendix A (RDFs) of the DEIS noise is "limited…at sunrise at the perimeter of a lek during the active lek season", which is supported by the scientific literature and here is has been extended to all activities, everywhere, all the time. What is the rational for this change? Also, how is "outside GRSG seasonal habitat" being defined? What are the boundaries for implementing this action? The lack of specificity may lead to inconsistent implementation.
7.	2-5	25	SETT	Rewrite to read "resilient to disturbance and ***resistant*** to invasive species"
8.	2-6	37	SETT	Change title to read "Sagebrush Steppe"
9.	2-8	4-5	SETT	Add to this action "unless grazing is part of the vegetation treatment design"
10.	2-8	4-5	SETT	Why would this action only apply only to winter habitat and no other types of seasonal habitat?
11.	2-8	6-8	SETT	This action belongs under the Riparian Habitat section.
12.	2-9	23-27	SETT	This action is a good management practice to strive for, but is not practical in all circumstances. Change to "limit the creation of temporary roads and rehabilitate to pre-project conditions post-construction"
13.	2-10	5-6	SETT	Why wouldn't tress less than 3.3 ft above shrub canopy be removed? If left they will continue to grow and make otherwise suitable habitat unsuitable.
14.	2-10	13-17	SETT	Utilize NDA EDMapps as a statewide repository for t weed, mapping, treatments, etc.
15.	2-11	5-7	SETT	The SEP likes this goal and hopes it will lead to increased suppression funding in sage-grouse habitats.
16.	2-16	Corridors Section	SETT	This section on corridors has not been in previous drafts of the EIS. It is difficult for the SETT to properly comment on the efficacy of these proposed objectives and actions without maps and other information on designated corridors.
17.	2-16	28-30	SETT	There should be a goal of no net unmitigated loss of sage-grouse habitat for the Lands and Realty section. If not, it is unclear how

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
				the Conservation Credit System would be incorporated. The SEP encourages BLM/USFS to include these goals
18.	2-16 – 2-19	Lands and Realty section	SETT	Why is the SETT Consultation and the avoid, minimize, mitigate process not included in the Lands and Realty section? This is particularly disconcerting for ROW applications. As state in Alt E, the SEP strongly opposes excluding SETT Consultation from the land use authorization process.
19.	2-16	34-36	SETT	It is unclear how limiting corridor width would achieve no net unmitigated loss if off-site mitigation is allowed. No net unmitigated loss would be achieved through the off-site mitigation, therefore the SETT recommends eliminating this action. Also, when referring to mitigation in the document, refer to the Conservation Credit System so that it is clear that it is applied in all instances.
20.	2-16	37-39	SETT	As noted in Alt E, the SEP is strongly opposed to ROW exclusion for solar and wind energy. The SEP believes that the impacts can be mitigated through the Conservation Credit System. It is also unclear why wind and solar have been singled out, but other ROWs are allowed. The ROW avoidance policy should apply to all types of ROWs.
21.	2-17	5-6	SETT	(Same as comment #2) The SEP is strongly opposed to a disturbance threshold cap as it will interfere with the effective implementation of the Conservation Credit System. In addition, this statement as written is unclear how this policy would be implemented. The 3% disturbance cap applies to what area – PMU, BSA, PAC? What happens when the threshold is reached? Is all development excluded and from what area? Will this apply to all land use, including locatable minerals? The SEP strongly urges BLM/ USFS to reconsider this policy.
22.	2-17	11-12	SETT	Is this the only instance in which new roads would be allowed?
23.	2-17	13-14	SETT	The SEP is strongly opposed to a de facto exclusion zones by disallowing all anthropogenic disturbances within 4 miles of occupied leks. No net unmitigated loss can be achieved through the Conservation Credit System.
24.	2-17	15	SETT	(Same as comment #6) In the Appendix A (RDFs) of the DEIS noise is "limited…at sunrise at the perimeter of a lek during the

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
				active lek season", which is supported by the scientific literature and here is has been extended to all activities, everywhere, all the time. What is the rational for this change? Also, how is "outside GRSG seasonal habitat" being defined? What are the boundaries for implementing this action? The lack of specificity may lead to inconsistent implementation.
25.	2-17	16-18	SETT	What does "provide seasonal protection" mean in this instance?
26.	2-17	16-20	SETT	Refer explicating to the Conservation Credit System in these bullets and wherever mitigation is mentioned.
27.	2-17	26	SETT	Between the words "lines" and "and", inset "when possible"
28.	2-17	30	SETT	What policy is being referred to here?
29.	2-17	31	SETT	(Same as comment #27) Between the words "lines" and "and", inset "when possible"
30.	2-17	36-37	SETT	How and when would this process to occur? Which "management decisions" are being referred to in particular? What happens if an existing site management plan is in conflict with the new policies, would it be shut down?
31.	2-18	8-12	SETT	The SEP is opposed to this action. Impacts from new roads can be avoided and minimized through the SETT Consultation process and remaining adverse impacts can be offset through the Conservation Credit System. This action also seems to conflict with RDF G-LR-LUA 1 (line 27)
32.	2-18	14	SETT	When discussing mitigation, explicitly refer to the Conservation Credit System so that it is clear it is applied in all instances.
33.	2-18	19-21	SETT	This action should be explored for feasibility, but should not be mandatory in all instances.
34.	2-18	26	SETT	New development should be located in existing utility corridors, but the option for new utility corridors should not be taken off the table. It is difficult to assess this action without information provided on existing utility corridors.
35.	2-18	34	SETT	Who are the "appropriate state entities" other than the SETT?
36.	2-19	24-25	SETT	This action seems unnecessary and excessive and is likely to hinder the scientific research process. What is the reason behind

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
				including this action?
37.	2-19	34-35	SETT	(Same as comment #3) What is the definition of tall structures? This is leaving it open to interpretation and may lead to the policy being implemented wildly differently among different field office and districts. Also, how can BLM/ FS enforce a policy of no new tall structures within 3 miles of nesting habitat, when nesting habitat is currently not mapped? Is this meant to say none within 3 miles of a lek? (In addition to comment #3) Also, what is the reason to apply a 3 mile buffer to tall structures and a 4 mile buffer to new anthropogenic disturbances (pg 2-17; lines 13-14)? Why are these numbers inconsistent?
38.	2-20	15-16	SETT	The SEP is strongly opposed to ROW exclusion for utility-scale commercial wind energy facilities. See comment #19
39.	2-20	19-23	SETT	The BLM/USFS has previously said they were unable to analyze the State Alternative due to insufficient detail on the avoid, minimize, mitigate process. The SEP undertook an effort to provide that detail, but that detail has been excluded from the Proposed Plan. It is not clear if the AMM process proposed by the SEP is what is being referred to here and if it will be incorporated into the Proposed Plan. Moreover, how will it be incorporated since there are conflicts between the SEP proposed AMM process and the ROW process outlines on pg 2-17, lines 1-22? This is very troubling.
40.	2-20	28-29	SETT	(Same as comment #20) The SEP is strongly opposed in ROW exclusion for solar and wind energy. The SEP believes that the impacts can be mitigated through the Conservation Credit System. It is also unclear why wind and solar have been singled out, but other ROWs are allowed. The ROW avoidance policy should apply to all types of ROWs.
41.	2-20	35-37	SETT	Incorporate PFC into the existing language.
42.	2-21	Table 2.7	SETT	Many sites, prior to grazing from any ungulates, may contain less than 35% herbaceous species and without manipulation will not recover naturally to meet that level. Will grazing be eliminated in these cases? Will AMLs be adjusted accordingly as well?

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
43.	2-21,22	Table 2.7	SETT	Removing livestock within 3-5 days in many cases may simply not be reasonable. It may be so at certain times of the year, in certain circumstances, and in narrow riparian areas, but may not be so on expansive sagebrush sites. Will horses also be removed within that same timeframe if determined to be the (or part of the) causative agents.
44.	2-21	Table 2-7	SETT	If a utilization trigger is reached, the BLM/USFS should consider additional options other than just removing livestock, such as modifying rotation, season of use, etc. Adjusting AUM is one tool in the toolbox to meet resource objectives, but it is not the only tool and it may not be the appropriate tool in all instances.
45.	2-22	27-29	SETT	The SEP is opposed to retirements of grazing privileges.
46.	2-22	2-7	SETT	Should some mention of the future establishment of additional certified monitoring personnel be included, given the inability to conduct assessments at the appropriate levels?
47.	2-22	20-21	SETT	After "would benefit" add "or would not be negatively impacted by the new"
48.	2-22	27-29	SETT	The SEC opposes any retirement or cancellation of ANY grazing privileges whether voluntary or involuntary. This is due primarily to the need for "grass banks" or options available to producers in years of drought, fire, and other natural disturbances that may occur within their allotments. This should be used as a way to adaptively manage grazing throughout time and sustain the initial multiple use intent on public lands.
49.	2-23	3	SETT	After "exclusion" add "of livestock and wild horses and burros".
50.	2-23	18-19	SETT	In areas with high concentrations of leks, such as Elko county, this may not always be possible.
51.	2-24	27-28	SETT	(Same as comment #41) If a utilization trigger is reached, the BLM/USFS should consider additional options other than just removing livestock, such as modifying rotation, season of use, etc. Adjusting AUM is one tool in the toolbox to meet resource objectives, but it is not the only tool and it may not be the appropriate tool in all instances.
52.	2-24	29-31	SETT	(Same as comment #41) If a utilization trigger is reached, the BLM/USFS should consider additional options other than just

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
				removing livestock, such as modifying rotation, season of use, etc. Adjusting AUM is one tool in the toolbox to meet resource objectives, but it is not the only tool and it may not be the appropriate tool in all instances.
53.	2-24	22-23	SETT	The water law should be stated first to imply that if a right to divert more than 50% exists, this RDF would not apply.
54.	2-24	24	SETT	Add “are” after “they”
55.	2-24	28	SETT	Define accordingly. Is this also defined in the WH&B section as well, if they are the causative agents?
56.	2-24	29	SETT	The same should hold true for WH&B if they are found to be the causative agents.
57.	2-25 -2-29	Fluid Mineral – Leased Fluid Mineral Estate section	SETT	Why is the SETT Consultation not included in the Leased Federal Fluid Mineral Estate section, even though the avoid, minimize, mitigate process and the Conservation Credit System is included? The SEP strongly opposes excluding SETT Consultation from this section.
58.	2-26	3-5	SETT	Similar to comment #39 (The BLM/USFS has previously said they were unable to analyze the State Alternative due to insufficient detail on the avoid, minimize, mitigate process. The SEP undertook an effort to provide that detail, but that detail has been excluded from the Proposed Plan. It is not clear if the AMM process proposed by the SEP is what is being referred to here and if it will be incorporated into the Proposed Plan. This is very troubling.)
59.	2-26	6-9	SETT	The SEP is opposed to NSO restrictions as referenced here and detailed in Appendix F. It is unclear how these restrictions would be applied since seasonal habitat types are not mapped. Also, overlapping seasonal habitats may lead to de facto year-round exclusion of certain activities.
60.	2-26	10-14	SETT	In this action no net unmitigated loss is only applied to PPMA, while in Action G-Lease FM 1 (pg 2-26, lines 3-5) it is applied to both PPMA and PGMA. These actions are in conflict with one another. If BLM/USFS only manages for no net unmitigated loss of PPMA, then would SETT Consultation, RDFs, the

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
				Conservation Credit System only apply to PPMA? If so, the SEP cannot support this. The SEP's objective is to achieve no net unmitigated loss to ALL sage-grouse habitat.
61.	2-26	15-19	SETT	Eliminate this language and instead refer the reader to the Conservation Credit System (Appendix A.) The SEP is concerned about descriptions of mitigation described in this document that do not align with the Conservation Credit System. The SEP is opposed to BLM/USFS using means other than the Conservation Credit System to determine mitigation obligations.
62.	2-26	19	SETT	Is "state wildlife agency consultation" meant to replace SETT Consultation in this instance
63.	2-26	34	SETT	How are "key" seasonal habitat defined here?
64.	2-29	24-35	SETT	The SEP is opposed to blanket NSO restrictions.
65.	2-29 - 2-31	Unleased Fluid Mineral section	SETT	Why is the SETT Consultation, the avoid, minimize, mitigate process, and the Conservation Credit System not included in the Unleased Fluid Mineral section? The SEP strongly opposes excluding these necessary processes from the Proposed Plan.
66.	2-29	28-29	SETT	Why has the SETT been excluded from this process? This is the correct opportunity for SETT Consultation.
67.	2-29	37-39	SETT	How does BLM/USFS intend to achieve no net unmitigated loss without application of the Conservation Credit System?
68.	2-30	5-7	SETT	This action is a repeat of Action G-UFM 2.
69.	2-31 – 2-32	Locatable Minerals section	SETT	Why is the SETT Consultation not included in the Locatable Minerals section? The SEP strongly opposes excluding this from the Proposed Plan.
70.	2-32	31-33	SETT	The SEP is opposed to the goal of no net unmitigated loss being applied solely to PPMA as stated above. Moreover, refer the reader to the Conservation Credit System. This description of mitigation does not totally align with the Credit system and it is not clear that the Credit System would be applied in this instance. The SEP is opposed to BLM/USFS using different mechanisms to determine credit obligation other than the Credit System. Also, the phrase "or provide for the enhancement of PPMA within the WAFWA management zone" is confusing and should be

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
				eliminated.
71.	2-32	34	SETT	The SEP is opposed to closing PPMA and PGMA to new mineral material disposal. Instead, apply the avoid, minimize, mitigate process, SETT Consultation, and the Conservation Credit System.
72.	2-33	3-6	SETT	As stated above, the SEP is strongly opposed to a disturbance cap.
73.	2-33	10-12	SETT	Why has SETT Consultation been excluded from the Salable Minerals section? The SEP is strongly opposed to this. Also, this action seems to be I conflict with Action G-SAL 1. Eliminate Action G-SAL 1.
74.	2-33	18	SETT	The SEP is strongly opposed to closing PPMA and PGMA to new nonenergy leasable mineral leasing. Instead, apply SETT Consultation, the avoid, minimize, mitigate process, and the Conservation Credit System.
75.	2-33	19-23	SETT	The Conservation Credit System should be applied to expansion of existing leases to ensure no net unmitigated loss of sage-grouse habitat.
76.	2-33	Mineral Split Estate section	SETT	Why has SETT Consultation, the avoid, minimize, mitigate process, and the Conservation Credit System been excluded from the mineral split estate section? The SEP is strongly opposed to this.
77.	2-34 – 2-35	Comprehensive Travel and Transportation Management section	SETT	Why has SETT Consultation, the avoid, minimize, mitigate process, and the Conservation Credit System been excluded from the travel and transportation management section? The SEP is strongly opposed to this.
78.	2-34	23-29	SETT	The SEP is opposed to this action. Instead apply SETT Consultation, the avoid, minimize, mitigate process and the Conservation Credit System to the construction of new roads to ensure no net unmitigated loss of sage-grouse habitat.
79.	2-35	30-31	SETT	Why has SETT Consultation, the avoid, minimize, mitigate process, and the Conservation Credit System been excluded from the Special Recreation permits and Special Use Authorization action? The SEP is strongly opposed to this.

Cmt #	Page #	Row # or Line #	Commenter Name	Comment
80.	2-34	32-36	SETT	The SEP is opposed to excluding the construction of new recreation facilities.
81.	2-36	26-28	SETT	The numbers 25 and 26 seem out of place in this sentence and are most likely a typo.
82.	2-36	34	SETT	The number 3 seems out of place in this sentence and is most likely a typo.
83.	2-40 – 2-44	Adaptive Management Guidance section	SETT	The SEP recognizes that the Adaptive Management section is still under development and that the BLM/USFS is working closely with the SETT and other agency partners to finalize this section. The SEP therefore will hold off comments on the Adaptive Management section at this time.
84.	2-44	20	SETT	Remove typo “Appendix EG”

Nevada and Northeastern California
Greater Sage-Grouse LUPA/EIS **April 29, 2015**

Preliminary Proposed LUPA/Final EIS for Cooperating Agency Review

To Cooperating Agencies:

The **Preliminary Proposed LUPA/Final EIS** is intended for internal review by the Cooperating Agencies from April 29 – May 13, 2015. (Please do not distribute.)

- Email your comments on the Preliminary Proposed RMPA/FEIS for by close of business Wednesday**, May 13, 2015** to Lauren Mermejo (lmermejo@blm.gov).

How to Provide Valuable Feedback

Commenting:
For each comment, please fill in the following information under the appropriate column heading in the matrix:

- ✓ Page number, line number, or table number on which you are commenting. **The page and line numbers in the PDF file or paper copies MUST be used.**
- ✓ Your comments:
  - **Your comments must be specific.**
  - If you have the same comment more than once, do not refer back to a previous comment number. Instead, please copy and paste your comment to a new row in the matrix and provide the specific page number, etc.
  - If you need additional space for comments, click in the table cell where you would like to comment, select the *Table* menu, *Insert*, and either *Rows Above* or *Rows Below*.

Comments on *Preliminary* Proposed Land Use Plan Amendment/Final EIS for Cooperating Agency Review
April 29, 2015

Cmt #	Chapter and Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M[1]	Response / How Resolved *(Reviewers: Leave this column blank)*
1.	Global Comment – Forest Service Proposed Plan		SETT	SETT	The FS proposed plan has no mention of coordination with the SETT through SETT Consultation and the Conservation Credit System. The Forest Service participated on the Sagebrush Ecosystem Council while these concepts were developed and approved. The FS is also in the process of developing an MOU with the SETT and other applicable state and federal agencies on these topics. The State strongly recommends that FS incorporate an action in the FS proposed plan similar to Action SSS9a in the BLM's proposed plan (pg 2-26, lines 21-28).		
2.	1-1	None	SETT	SETT	In the changes to Chapter 1since the DEIS, SFAs are introduced in this chapter. However, they are not introduced until chapter 2. SFA is referenced in footnotes to tables in this chapter, but those footnotes are not very clear to their meaning, even if the reader understands what the SFAs are.		
3.	1-32	24-27	SETT	SETT	Predator management is not adequately addressed. This issue needs to be addressed to inform federal policy changes.		
4.	2	Livestock Grazing Section	SETT	SETT	There is no mention of the use of Temporary Non-Renewable permits as an adaptive management technique to address abundant fuels, primarily cheatgrass, for dormant season grazing.		
5.	2-3	18	SETT	SETT	SFAs are not consistent with the State Plan goals and objectives		
6.	2-4/12	17 17-19	SETT	SETT	Grazing permits with "Allotment Management Plans and associated Monitoring Plans" be established in these areas with cooperation between the land manager and permittee. Monitoring of the AMP should incorporate the use of the Nevada Rangeland Monitoring Handbook (UNCE 06-03) in order to provide the permittee a proactive approach to managing and monitoring.		

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7.	2-12	4-12	SETT	SETT	The methods behind the development of SFAs are not included in the FEIS. The State requests that the process for delineating such is outlined in the FEIS.		
8.	2-14 2-25	31-38 1-16	SETT	SETT	Why are these RDFs specifically called out here? Isn't that the purpose of Appendix D?		
9.	2-17	14	SETT	SETT	To meet GRSG should be changed to trend towards		
10.	2-17	31-33	SETT	SETT	Reference where the protocol exists to make a determination.		
11.	2-17	38-40	SETT	SETT	What is the process for determining if an authorized use is the cause of a site not meeting sage-grouse habitat objectives? What actions will be considered if the authorized use is not the cause? How will these be applied consistently across BLM districts and offices if there is no detailed guidance is provided?		
12.	2-18	Lek	SETT	SETT	What is considered a tall structure? Anything other than a fence? For PJ the distance is .6 miles, but everything else is 3 miles?		
13.	2-18	All life stages	SETT	SETT	Inconsistent with the changes made to Table 4-1 in the State Plan based on the input of the Science Work Group. Change to match the updated State Plan Table.		
14.	2-18 2-20	Table 2-2	SETT	SETT	The habitat objectives are delineated by different seasonal habitat types, however the EIS only has a habitat map, not a seasonal habitat map. How will the seasonal habitat be determined? If the seasonal habitats are not delineated, how will these objectives be applied?		
15.	2-19	Riparian/ Security	SETT	SETT	What is "high" species richness? Should there be a range?		
16.	2-19	Riparian/ Security	SETT	SETT	What should be considered adjacent? Is it a range of distances?		

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Cmt #	Chapter and Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M[1]	Response / How Resolved *(Reviewers: Leave this column blank)*
17.	2-19	Winter	SETT	SETT	What data is used to determine snow depth? Is it available for all sites?		
18.	2-19	Brood Rearing/ Cover	SETT	SETT	Language in indicators should be clear that it can be the combination of PG and forbs or either, but not necessarily both.		
19.	2-19	Brood Rearing/ Cover	SETT	SETT	If the upland site does not meet the forb and grass requirement due to shrub domination what will be the recommended treatment?		
20.	2-19	Brood Rearing/ Cover	SETT	SETT	Will a list of the "deep rooted" species be available? The Hagen reference is misapplied here.		
21.	2-19	Brood Rearing/Summer	SETT	SETT	Brood Rearing/ Summer - Upland Habitats – Cover – Deep rooted perennial bunchgrasses: The State urges the BLM to consider the alternative submitted by the State as it is written it is in direct conflict with the State Plan as updated April 2015. The State does not support the specification of a grass height, as this metric is highly variable across ecological sites and there is little evidence to support this. A height range should be considered. A mosaic of structure is most conducive. A 7" grass height may be unreasonable during drier climatic conditions and also may essentially render livestock use to 0% as it may be very difficult to impossible to manage for utilization at that level, which may increase the threat of fire due to under utilization Also, recent studies indicate that our most rigorous native plants that are most adaptive to a warming climate can be shorter and less robust than what we are accustomed to believing to be our most rigorous (Beth Leger presentation). Over time, this may make a single grass height objective unattainable.		

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22.	2-19	Brood Rearing/ Cover and food	SETT	SETT	Under habitat types, the word cover should be removed. It is already addressed above under "Cover".		
23.	2-19	Nesting	SETT	SETT	Inconsistent with other tall structure language within the table. Does the research show that PJ and tall structures should have the same buffer distance? If so, these should be consistent.		
24.	2-19	Riparian/ Cover and Food	SETT	SETT	Do we know the current status of all riparian systems in the state? Do 5% meet PFC? This could severely impact existing users for uses that occurred decades ago.		
25.	2-19	Brood Rearing/ Summer – Upland Habitats – Cover and food	SETT	SETT	Brood Rearing/ Summer – Upland Habitats – Cover and food: Why is perennial forb canopy cover applied to brood rearing upland sites and not riparian/ meadow sites? Casazza et al 2011 looked at site in meadow habitats. This reference is being sited incorrectly.		
26.	2-20	20-22	SETT	SETT	Also should consider if the project/activity has any indirect impacts to PHMA or GHMA habitats.		
27.	2-20	Table 2-2	SETT	SETT	Foot note 6: This sentence is very confusing as written. Please revise so intent is clear		
28.	2-20	Subscript 5	SETT	SETT	Consider including language about current climatic conditions (not just winter ppt.).		
29.	2-20	Subscript 6	SETT	SETT	This language is very confusing. In wet years does the same parameter exist?		
30.	2-20	Table 2-2	SETT	SETT	The State recommends that the State Alternative Desired Habitat Conditions Table 2-13 be used, not Table 2-2.		

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Cmt #	Chapter and Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M[1]	Response / How Resolved *(Reviewers: Leave this column blank)*
31.	2-21	1-25	SETT	SETT	A disturbance cap is inconsistent with the State of Nevada's Sage-grouse Conservation Plan. A disturbance cap is not a useful management tool given Nevada's unique topography. In many instances greater than 3% disturbance in winter habitat would not have a negative impact on populations, whereas less than 3% disturbance on limited brood rearing habitat could have a detrimental impact. A disturbance cap does not adequately address the importance of limiting habitat type in Nevada. We believe the CCS is a more appropriate tool for protecting limiting habitat and achieving a net conservation gain. The State does not support a disturbance cap.		
32.	2-21	18-19	SETT	SETT	This language should state "…within PHMA in a proposed project analysis area, no further…". It is a question if the disturbance cap is just in PHMA within the project analysis area, or if it is all area within the project analysis area. Proposed edit would infer the former, while the current language infers the latter.		
33.	2-21 2-22	26-44 1-12	SETT	SETT	The State does not concur with a disturbance cap; however, if this section is kept it should include a representative from the Sagebrush Ecosystem Technical Team on the team. As such, the DCNR Director should be included in the process if the team does not agree, as SETT is a program within DCNR.		
34.	2-22	26-27	SETT	SETT	Reference the use of the Conservation Credit System here as the mechanism to achieve an overall net conservation gain to GRSG through mitigation.		

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Cmt #	Chapter and Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M[1]	Response / How Resolved *(Reviewers: Leave this column blank)*
35.	2-22	28-31	SETT	SETT	It is unclear why this sentence is inserted here. The term "habitat loss and degradation" is not used previously, so it is unclear why it is being defined here. Moreover, this bullet is specific to offsetting anthropogenic disturbances through mitigation; however, the table listing threats identified in the 2010 USFWS listing decision referenced here includes non-anthropogenic disturbance threats such as conifer encroachment and wildfire. Remove this sentence or clarify why it is included here.		
36.	2-22	39-41	SETT	SETT	What does the term "do not necessarily require" mean here? When will this apply and when will it not? Who will determine when it applies?		
37.	2-23	3-32	SETT	SETT	Why are these RDFs specifically called out here? Isn't that the purpose of Appendix D?		
38.	2-24	4-6	SETT	SETT	Reference the use of the Conservation Credit System here as the mechanism to achieve an overall net conservation gain to GRSG through mitigation.		
39.	2-24	7-10	SETT	SETT	It is unclear why this sentence is inserted here. The term "habitat loss and degradation" is not used previously, so it is unclear why it is being defined here. Moreover, this bullet is specific to offsetting anthropogenic disturbances through mitigation; however, the table listing threats identified in the 2010 USFWS listing decision referenced here includes non-anthropogenic disturbance threats such as conifer encroachment and wildfire. Remove this sentence or clarify why it is included here.		
40.	2-24	18-20	SETT	SETT	What does the term "do not necessarily require" mean here? When will this apply and when will it not? Who will determine when it applies?		

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Cmt #	Chapter and Page #	Row # or Line #	Reviewer Name	Reviewer Office/ Affiliation	Comment	A/R/M[1]	Response / How Resolved *(Reviewers: Leave this column blank)*
41.	2-25	17-30	SETT	SETT	Is mitigation not required in BLM's OHMAs/ State's General Management Areas? This is not consistent with the State Plan. Greater conservation benefit can be provided by requiring mitigation in OHMA and is another example of the robustness of the State Plan.		
42.	2-25	31	SETT	SETT	Figure 1-3 does not show the SFAs.		
43.	2-25	37-38	SETT	SETT	Grazing permits with "Allotment Management Plans and associated Monitoring Plans" be established in these areas with cooperation between the land manager and permittee. Monitoring of the AMP should incorporate the use of the Nevada Rangeland Monitoring Handbook (UNCE 06-03) in order to provide the permittee a proactive approach to managing and monitoring.		
44.	2-25	38	SETT	SETT	Are specific LG actions supposed to be listed, or is this just referencing the reader to the entire LG section?		
45.	2-26	1	SETT	SETT	SSS 6: NDOW already maintains a GRSG telemetry database.		
46.	2-26	21-28	SETT	SETT	Why is the BLM not requiring the use of the Conservation Credit System? The State is concerned that if other mitigation systems are used in addition to the approved CCS, inconsistent mitigation goals and requirements will be applied across the landscape. The document is unclear as to what other applicable mitigation systems may be used. It is also unclear how these other mitigation systems will result in at least equivalent conservation benefits as the State's CCS.		
47.	2-26	21-28	SETT	SETT	Consultation with the SETT should be integrated in Action SSS 1 through SSS 4 throughout the document.		
48.	2-26	24	SETT	SETT	These citations are not provided in Chapter 7.		
49.	2-26	25	SETT	SETT	Change applicable to equivalent		

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50.	2-26	35-36	SETT	SETT	Other types of fencing should be allowed on a case by case basis.		
51.	2-27	11	SETT	SETT	Encourage the reduction of anthropogenic subsidies and BMPs to assist in compliance		
52.	2-27	21	SETT	SETT	This action recommends removal of fences and powerlines. The State acknowledges the value of fences as valuable management tools and powerlines as valuable services to our state citizens. Recommend the following wording within the parentheses. "(e.g., remove nonworking fences and nonworking powerlines, and install anti-perch devices on existing and new fences and powerlines) "		
53.	2-27	22	SETT	SETT	Consider avoidance using underground corridors as practicable		
54.	2-27	28-32	SETT	SETT	This is unclear as written. Maintain as what? How is capability determined? How has this objective developed and is what is the justification for it?		
55.	2-28	2	SETT	SETT	Change achieve to trend towards		
56.	2-28	4-5	SETT	SETT	Will the seasonal restrictions in SSS 1 through SSS 4 prohibit timely application of herbicide and other noxious weed treatments.		
57.	2-28	30	SETT	SETT	Why is the term "reduce" used instead of "minimize"? How does this coincide with Appendix J?		
58.	2-28	7, 15, 23, 34	SETT	SETT	Change "meet" to "trend towards"		
59.	2-29	12	SETT	SETT	Change "meet" to "trend towards"		
60.	2-29	22	SETT	SETT	Include State Plant Materials Programs.		
61.	2-30	Footnote 2	SETT	SETT	Table 2-3 footnote 2- this footnote uses an "or" statement which implies that acres could be sagebrush OR conifer. We believe the intent was >30% sagebrush cover AND invaded by >10% conifer. This needs clarification.		

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62.	2-30	Footnote 2	SETT	SETT	Table 2-3 footnote 2. The footnote should include reference to Action WFM-HFM 5. Suggested wording, "or greater conifer. In addition, acreage objective will be met while meeting conditions outlined in Action WFM-HFM." This meets the State's expectation of considering Resistance and Resilience in the use of prescribed fire.		
63.	2-31	16	SETT	SETT	Recommend including coordination with State Departments of Agriculture and consulting EddMaps for mapped areas of infestions.		
64.	2-32	3	SETT	SETT	Where post treatment rehabilitation will be needed, do not treat areas any larger than what has been reasonably budgeted for rehabilitation, keeping in mind that several years of revegetation attempts may be required to successfully establish a site with desirable forbs, grasses, and shrubs.		
65.	2-32	14	SETT	SETT	Change "achieve" to "trend towards"		
66.	2-32	19	SETT	SETT	Change "meet" to "trend towards"		
67.	2-33	16	SETT	SETT	Add at the end of the sentence "oversight, to include state and local resources and equipment."		
68.	2-36	5	SETT	SETT	Add language to address the sites resistance and resilience.		
69.	2-36	7	SETT	SETT	Change "four" to "five" (if the above mentioned bullet is added)		
70.	2-36	10	SETT	SETT	Add the words "including state and local resources" after process.		
71.	2-37	12	SETT	SETT	Add- …invasion), "and considers site resilience in PHMAs"		
72.	2-37	15	SETT	SETT	Change "meet" to "trend towards"		
73.	2-38	2	SETT	SETT	Add a sentence after sentence 1 "Prioritize areas of low resilience to slow the subsequent invasion of annual grasses."		
74.	2-38	27	SETT	SETT	Add- island plantings, using locally sourced plant materials where possible, based on…		
75.	2-39	5	SETT	SETT	Change "make progress" to "trend"		

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76.	2-39	6	SETT	SETT	Recommend the LG-1 be changed to the following to be consistent with the State Plan. "In sage-grouse habitat, manage for vegetation composition and structure that maintains or is actively managed to trend towards achieves sage-grouse seasonal habitat objectives desired habitat conditions, as applicable (see Table 2-13), enhancing resilience and resistance based upon the ability of the ecological site to respond to management. This objective recognizes spatial and temporal variations across seral stages."		
77.	2-39	10	SETT	SETT	Permitted livestock grazing is determined to be **the** significant…		
78.	2-39	20	SETT	SETT	Not consistent with state plan. Previous bullets are in the State Plan		
79.	2-39	21-28	SETT	SETT	Given the workload and limited resources, does this allow for further degradation of already degraded sites outside of SFAs and PHMAs?		
80.	2-39	29-35	SETT	SETT	Since the focus is on the SFAs and PHMAs, will the processing of EAs, categorical exclusions, etc. also receive first priority for processing to alleviate or address livestock grazing concerns in these areas?		
81.	2-39	37	SETT	SETT	Change sentence to "whether or not lands are trending toward GRST habitat objectives (Table 2-2) taking into account ecological site descriptions, adaptive management, and other land uses and plans. " There should be a phased approach for doing the assessments and an adequate number of years (3-5 years) allowed to adjust management to allow for compliance or trending towards it.		

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82.	2-39 through 2-43	Livestock Grazing section	SETT	SETT	Inconsistent language is used throughout the livestock grazing section. The terms "causal factor," "significant causal factor," and "influencing factor" are used throughout this section. Please correct if these terms are being used inconsistently. If these terms have different meanings, specify the definitions.		
83.	2-40	1	SETT	SETT	Comment: If an allotment has never been evaluated and had the chance to modify usage to trend toward objectives, there needs to be time to allow for changing of practices to work before pulling livestock off.		
84.	2-40	10	SETT	SETT	Consider the following wording, "objectives (table 2-2) are not met, with consideration for ecological site potential, in SFAs, PHMS or… "		
85.	2-40	11	SETT	SETT	Change "met" to "trending toward"		
86.	2-40	11-12	SETT	SETT	The use of the term "contributing factor" is highly disconcerting in this context. It provides for all livestock grazing to be eliminated or highly restricted anywhere habitat objective are not be met, even if others factor are the primary reason for objectives not being met.		
87.	2-40	11-12	SETT	SETT	Consistent terminology should be used when identifying a causal agent, **a** or **the** contributing factor, etc. The way it is currently written leaves it too open ended.		
88.	2-40	32-33	SETT	SETT	This is overly restrictive and may not be effective at achieving habitat objectives.		
89.	2-40	34-35	SETT	SETT	Remove livestock from where? The allotment? Potentially a very small acreage impacted by livestock could result in the underutilization in other areas within an allotment which could increase the risk of fire and other unintended consequences.		

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90.	2-41 2-42	26-40 1-5	SETT	SETT	Explain what specific grazing conflicts will need to be addressed to allow a transfer of a BLM grazing permit. How are we going to determine that they are adversely affecting GRSG habitat to a level that a legal transfer of permittee ownership will be affected?		
91.	2-40 2-41	32 to line2 of next page	SETT	SETT	Rangeland Ecologist from the University of Nevada, Reno (at the most recent Science Work Group meeting) discussed that the seasonal restrictions and restrictive removal dates (3-7 days) in this section would be detrimental not only to private meadows, but to the livestock producer as well. This restriction takes away the ability to utilize the full allotment and should be addressed with a locally derived "Allotment Management Plan that allows for appropriate rotational use and protection of riparian areas while utilizing upland areas that remain a fuel source." The unintended consequence of this restrictive management is increased fuels, increased and over use of private meadows and poor management at the allotment level.		

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92.	2-40/41	34-37; 1-9	SETT	SETT	Inconsistent with the State Plan. Are these bullets what will not be considered "allowable use levels" throughout the planning area? Utilization is not the best measurement in all cases. The protocol for conducting these assessments should be cited here and allowed to be analyzed. SETT recommends utilizing the Desired Habitat Conditions language from the State Plan; "Adequate cover based on ecological site description potential" has a scientific basis. Utilizing an exact grass height does not meet the intention of locally driven habitat restoration based on ecological site potential. The State is opposed to a one size fits all standard, which does not take into account ecological site potential and other site specific factors and doesn't allow for modification of practices in order to trend towards objectives.		
93.	2-41	13-16	SETT	SETT	Inconsistent with the State Plan's objective for no net loss of AUMs. The first sentence is poorly written. It is unclear what is meant in this Action. If livestock are removed, how could they be an influencing factor (also confusing use of terminology 2-40 line 12 (e.g. influencing or contributing factor))? Not allowing transfer of AUM may lead to higher intensity fires.		
94.	2-41	17-20	SETT	SETT	ESDs and other resource considerations for a site should be incorporated into determining site-specific objectives for grazing permits.		
95.	2-41	18	SETT	SETT	Change "meet" to "trend toward"		

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96.	2-41	18	SETT	SETT	Establishing terms and conditions based upon table 2-2 is inconsistent with the State's Plan which also contains a similar table, but does refer to it as an objective, but rather a desired habitat condition. This allows the land manager and the land user sufficient time to make necessary changes to maintain or move towards meeting the desired condition. Table 2-2 is referenced throughout the document and should be evaluated for consistency throughout the document.		
97.	2-41	20-21	SETT	SETT	This sentence should be added to, to include Ecological Site Descriptions and "Rangeland Health Assessments will be conducted by qualified personnel. (As required by "Interpreting Indicators of Rangeland Health. V.3. Technical Reference 1734-2 (2000))."		
98.	2-41	30	SETT	SETT	Define what the term "significant" means in this context.		
99.	2-42	6	SETT	SETT	Change "met" to "trending toward"		
100.	2-42	6-9	SETT	SETT	Is it possible to be meeting land health standards, but not GRSG habitat objectives? Or vice-versa? If so, how will it be addressed?		
101.	2-42	10-14	SETT	SETT	If limited staff or budget only allow for these areas to be field checked, other species and habitats may become neglected.		
102.	2-42	16	SETT	SETT	Change "achieve" to "trending toward"		
103.	2-42	26-27	SETT	SETT	The foot print around any water development for livestock is likely to be heavily used. However, modification to water developments may have a larger net benefit to sage-grouse. This should be considered within this management action.		

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104.	2-42	28-30	SETT	SETT	A citation may be needed here. 50% seems to be an indiscriminate percentage. 50% of small springs (5 GPM)? Nearly all surface water is already adjudicated. During high flows, spreading or impounding more than 50% of the flow may desirable over the longer term.		
105.	2-42	31-35	SETT	SETT	The use of the term "only" contradicts the previous part of the sentence. The holistic view of a water development needs to be considered here, not just the immediate impacts of the diversion and use areas.		
106.	2-43	2-3	SETT	SETT	Distance is not consistent with state plan recommendations (1/2 mile from springs and riparian's and 1 mile from leks).		
107.	2-43	5-10	SETT	SETT	Does this also include water impoundments for irrigation purposes? If so, this could be short sighted in light of potential climate variability which may dictate a change in timing, type of precipitation, and water availability.		
108.	2-43	11-6	SETT	SETT	What if grazing is part of the vegetative treatment/ management plan? This should be specified. Language should be included that allows for grazing as a means of adaptive management. If a seeding is not successful, and cheatgrass is present, in the second year when cheatgrass is most likely to become dominant, targeted grazing could be used during the treatment period to reduce competition and enhance recruitment of subsequent seeding efforts.		
109.	2-43	19-20	SETT	SETT	The State Plan promotes a no-net loss of AUMs.		
110.	2-43	20	SETT	SETT	Shouldn't be so restrictive as fire breaks may greatly benefit from grazing for maintenance of the decreased fuel load		
111.	2-43	34	SETT	SETT	Change "achieve" to "trend toward"		

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112.	2-44	14	SETT	SETT	Change "meeting" to "trending toward". Can "significant causal factor" be accurately determined?		
113.	2-44	15	SETT	SETT	Insert "under of the provisions of the Wild Horse and Burro Act," after the word AML.		
114.	2-44	23-26	SETT	SETT	The word 'consider' should be removed from line 23. Removal or exclusion should occur in an amount necessary to offset the loss created by the emergency condition.		
115.	2-44	25	SETT	SETT	Change "meeting" to "trending toward"		
116.	2-45	17-19	SETT	SETT	Mineral withdrawals are inconsistent with the State Plan. The State does not support this action. Further this action is not supported by the COT report which does not list mining as the most significant threat to sage-grouse habitat in Nevada.		
117.	2-45	23-24	SETT	SETT	Exclusion areas are inconsistent with the State Plan. The State does not support this action. The State recommends designating these areas as ROW avoidance and applying the avoid, minimize, mitigate policies, not ROW exclusion.		
118.	2-45	31-32	SETT	SETT	Exclusion areas are inconsistent with the State Plan. The State does not support this action. The State recommends designating these areas as ROW avoidance and applying the avoid, minimize, mitigate polices, not ROW exclusion.		
119.	2-48	1-7	SETT	SETT	Will ALL current ROW, permit, and lease holders be required to retrofit existing structures? What if this is not possible? Will the ROW, permit or lease be pulled? This is inconsistent with the State Plan. The State does not support that this be required.		
120.	2-48	19-27	SETT	SETT	What does the term "priority" mean in this objective? How would this be implemented?		

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121.	2-49	1-2	SETT	SETT	This is inconsistent with the State Plan. The State does not support this action.		
122.	2-49	3-11	SETT	SETT	Add language to allow for exemption if all direct and indirect impacts on GRSG and its habitat can be offset through compensatory mitigation via the Conservation Credit System.		
123.	2-49	21-31	SETT	SETT	The SETT should be included in this technical review team. As such, the DCNR Director should be included in the process if the team does not agree, as SETT is a program within DCNR.		
124.	2-49	35-38	SETT	SETT	Include the SETT in the team. General comment: BLM should be using the CCS for mitigation per the MOU so why would you need a team to discuss appropriate mitigation using best available science for this when the CCS already incorporates that?		
125.	2-51	8-9	SETT	SETT	Mineral withdrawals are inconsistent with the State Plan. The State does not support this action.		
126.	2-51	15-20	SETT	SETT	Why is the BLM not requiring the use of the Conservation Credit System? The State is concerned that if other mitigation systems are used in addition to the approved CCS, inconsistent mitigation goals and requirements will be applied across the landscape. The document is unclear as to what other applicable mitigation systems may be used. It is also unclear how these other mitigation systems will result in at least equivalent conservation benefits as the State's CCS.		
127.	2-51	27-29	SETT	SETT	Exclusion areas are inconsistent with the State Plan. The State does not support this action. The State recommends designating these areas as avoidance areas and applying the avoid, minimize, mitigate policies.		

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128.	2-52	10-11	SETT	SETT	Exclusion areas are inconsistent with the State Plan. The State does not support this action. The State recommends designating these areas as avoidance areas and applying the avoid, minimize, mitigate policies.		
129.	2-57	14-25	SETT	SETT	A disturbance cap is inconsistent with the State of Nevada's Sage-grouse Conservation Plan. A disturbance cap is not a useful management tool given Nevada's unique topography. In many instances greater than 3% disturbance in winter habitat would not have a negative impact on populations, whereas less than 3% disturbance on limited brood rearing habitat could have a detrimental impact. A disturbance cap does not adequately address the importance of limiting habitat type in Nevada. We believe the CCS is a more appropriate tool for protecting limiting habitat and achieving a net conservation gain. The State does not support a disturbance cap.		
130.	2-58	Table 2-5	SETT	SETT	The State agrees with the objective set for "perennial grass height" and encourages the BLM to adopt similar language into their Table 2-2.		
131.	2-60	Table 2-6	SETT	SETT	The State agrees with the objective set for "perennial grass height" and encourages the BLM to adopt similar language into their Table 2-2.		
132.	2-62	12	SETT	SETT	What does the term "restricted" mean in this context?		
133.	2-62	24	SETT	SETT	Consider language that allows for locally developed Allotment Management Plans and associated Monitoring Programs in order to adjust operations and remain proactive in conservation.		
134.	2-62	29-31	SETT	SETT	Is the retrofit required? What happens if this is not feasible?		

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135.	2-63	8-13	SETT	SETT	Will ALL current ROW, permit, and lease holders be required to retrofit existing structures? What if this is not possible? Will the ROW, permit or lease be pulled? This is inconsistent with the State Plan. The State does not support that this be required.		
136.	2-63	32	SETT	SETT	What does the term "restrict" mean in this context?		
137.	2-64	12-16	SETT	SETT	Exclusion areas are inconsistent with the State Plan. The State does not support this action. The State recommends designating these areas as avoidance areas and applying the avoid, minimize, mitigate policies.		
138.	2-65	5-7	SETT	SETT	Add language such as "…or for fuels reduction purposes necessary to protect GRSG habitats."		
139.	2-66	23-25	SETT	SETT	Holistic view of "beneficial" should be observed here (e.g. desirable movement or management of livestock). This objective appears to restrict the ability to establish water developments which aid in the protection of the meadows that are so important to Sage-grouse. Remove "do not approve" and potentially add "coordinate the development and construction of water developments in order to provide benefit for"….		
140.	2-67	9	SETT	SETT	Add reference to the Sage-Grouse Fence 37 Collision Risk Tool to Reduce Bird Strikes (NRCS 2012). This meets the State's expectation for fence flagging evaluation.		
141.	2-67	Table 2-8	SETT	SETT	The State is opposed to setting standard stubble heights across the range. This is inconsistent with the State Plan. We do not believe that the scientific literature supports a specific grass height to be universally applied throughout the State.		
142.	2-67	Top of page	SETT	SETT	GRSG-LG-002- formatting issue and not consistent with the State Plan's no net loss of AUMs		

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143.	2-68	2	SETT	SETT	Here and throughout, consider making the distances consistent between federal land management agencies unless specific cause can be made for the difference.		
144.	2-69	2	SETT	SETT	Add …hydrophobicity)," and take into consideration the resiliency of the site to the prescribes severity of the burn."		
145.	2-69/70	30-37; 1-11	SETT	SETT	WHB Section: Why is a stubble height applied to livestock grazing and not to wild horse and burro grazing? This is inconsistent.		
146.	2-71	1-6	SETT	SETT	What about for local community access as well as administrative access?		
147.	2-71	34-36	SETT	SETT	If there is high traffic volume on roads, it most likely means that it is necessary for local community access. If the road is closed, it will put traffic onto another road. Instead, consider other solutions such as reducing speed limits.		
148.	2-72	4-8	SETT	SETT	The SETT should be included in this technical review team.		
149.	2-72	17-18	SETT	SETT	This is inconsistent with the State Plan. The State does not support this action.		
150.	2-72	21-23	SETT	SETT	Include the SETT in the team.		
151.	2-75	2-5	SETT	SETT	Reference the use of the Conservation Credit System in this action.		
152.	2-75	24-25	SETT	SETT	This is inconsistent with the State Plan. The State does not support this action.		
153.	2-76	31	SETT	SETT	The "SETT" did not collectively participate in the development of the Adaptive Management Triggers, definitions, and methods. Take out Nevada SETT.		

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154.	2-80/82	2-80 line 30 through 2-82 line 15	SETT	SETT	A reference is needed to explain the Specific Triggers related modeling in 1. a-e, 2. a-c and 3. A-c. It is not clear from the introduction or the footnotes. A better explanation is needed to understand the hard and soft triggers. (Specifically 0.90 and 0.10 in 1.a. i-ii, is not explained. Footnotes explain adjustment of value, but not what the value is derived from? Model, estimation etc.?		
155.	2-82	33-36	SETT	SETT	How does this relate to the 3% disturbance cap? Why are the numbers different? Why are both policies necessary? They seem to be duplicative and inconsistent.		
156.	2-83	19-22	SETT	SETT	The SETT should be included in this interdisciplinary team.		
157.	2-83	23-25	SETT	SETT	GRSG populations are monitored at multiple levels; including lek and lek cluster, which makes sense. However, the hard trigger response is always at the BSU level. For example, a population decrease at one single lek triggers a management response, limiting land uses, at the BSU level. This seems like a disproportionate response.		
158.	2-85	8-15	SETT	SETT	The CCS' HQT should be used instead of the HAF for determining suitable habitat. The HQT will be required for any projects which will use the CCS to offset impacts through compensatory mitigation. There is no reason to require duplicative efforts.		
159.	2-86	7-14	SETT	SETT	The CCS' HQT should instead of the HAF for determining suitable habitat. The HQT will be required for any projects which will use the CCS to offset impacts through compensatory mitigation. There is no reason to require duplicative efforts.		
160.	2-87	5-10	SETT	SETT	Include SETT in the coordination on lands in Nevada.		

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161.	2-90	1-21	SETT	SETT	Why is the CCS not specified in this section?		
162.	2-92	1-6	SETT	SETT	Why is BLM not requiring the use of the CCS? In what circumstances would the BLM use a different mitigation system? What systems would the BLM consider? How would this be consistently applied? How would this provide any assurances to the USFWS?		
163.	2-97/98	Table 2-11	SETT	SETT	SETT recommends utilizing the Desired Habitat Conditions table from the State Plan for Nevada. The Table was developed and agreed upon by multiple stakeholder groups.		
164.	2-99/100	Table 2-12	SETT	SETT	Rangeland Ecologist from the University of Nevada, Reno (at the most recent Science Technical Team Meeting) discussed that the seasonal restrictions and restrictive removal dates (3-7 days) in this section would be detrimental not only to private meadows, but to the adjacent or nearby sites associated with the permit or pasture as well as the livestock producer's private land. This restriction takes away the ability to utilize the full allotment and should be addressed with a locally derived "Allotment Management Plan that allows for appropriate rotational use and protection of riparian areas while utilizing upland areas that remain a fuel source." The unintended consequence of this restrictive management is increased fuels, increased and over use of private meadows and poor management at the allotment level. The Nevada Rangeland Monitoring Handbook (UNCE 06-03) should be added as an accepted protocol and resource.		
165.	2-101	40	SETT	SETT	Change "meeting" to "trending toward"		
166.	4-44	7	SETT	SETT	The State Alternative uses Table 2-13, not Table 2-2. Please correct the text.		

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167.	4-46	1-2	SETT	SETT	The State Alternative does not close any areas to oil and gas leasing. This sentence with number of acres closed should be deleted.		
168.	A-10	17	SETT	SETT	DRMP is not in the acronyms list in Chapt 8.,		
169.	A-6	13	SETT	SETT	The State Alternative should be listed as (E), not (C).		
170.	A-7	32	SETT	SETT	A citation should be included at the end of the sentence that ends on the middle of this line "modeling by the USGS (Coates et al. 2014). The updated…" This citation is already in Chapter 7.		
171.	A-8	4-6	SETT	SETT	The sentence that starts at the end of line 4 incorrectly summarizes the methods for the Space Use Index. In addition there are wording issues in the last sentence. Finally, I would recommend referencing the reader to the Coates et al. 2014 for full methods. Please replace "The lek data included a buffer around leks to develop a Use Index. The Use Index was then intersected with the habitat suitable index (SUI) to identify management categories for GRSG planning efforts.", with "A Space Use Index (SUI) was developed based on lek attendance and density coupled with probability of sage-grouse occurrence relative to distance to nearest lek. The SUI was then intersected with the habitat suitably index to identify management categories for GRSG planning efforts as outlined below. Please reference Coates et al. 2014 for complete methods."		

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172.	App F		SETT	SETT	A disturbance cap is inconsistent with the State of Nevada's Sage-grouse Conservation Plan. A disturbance cap is not a useful management tool given Nevada's unique topography. In many instances greater than 3% disturbance in winter habitat would not have a negative impact on populations, whereas less than 3% disturbance on limited brood rearing habitat could have a detrimental impact. A disturbance cap does not adequately address the importance of limiting habitat type in Nevada. We believe the CCS is a more appropriate tool for protecting limiting habitat and achieving a net conservation gain. The State does not support a disturbance cap.		
173.	App P	Pg 4 title page of state plan	SETT	SETT	Change date from April 9, 2015 to October 1, 2014 with a note below that date saying that within this Appendix version, Section 4.0 was updated reflecting changes made at the April 9, 2015 SEC meeting.		
174.	B-1	4-27	SETT	SETT	Do these lek buffers distances mean the corresponding activities will be prohibited within the specified buffer distance, or this is used as a set assessment area? Please clarify. The State does not support exclusion areas.		
175.	B-2	34	SETT	SETT	Rangeland structures may often provide beneficial management within GHMA. Insert the following bullet as the 3rd bullet. (It is language taken from the PHMA on pB-3 line 9-12) -Range improvements which do not impact GRSG, or, range improvements which provide a conservation benefit to GRSG such as fences for protecting important seasonal habitats, meet the lek buffer requirement		
176.	B-3	3-8	SETT	SETT	Include the SETT in this process.		
177.	D-4	3	SETT	SETT	It is unclear what RDFs the asterisk sentence refers to.		

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178.	F-1	2	SETT	SETT	This language should state "…within PHMA in a proposed project analysis area, then no further…". It is a question if the disturbance cap is just in PHMA within the project analysis area, or if it is all area within the project analysis area. Proposed edit would infer the former, while the current language infers the latter.		
179.	F-2	17	SETT	SETT	Between the words "modified" and "to" insert the following "or offset through off-site compensatory mitigation.		
180.	F-2	22-31	SETT	SETT	The SETT should be included in this technical review team. As such, the DCNR Director should be included in the process if the team does not agree, as SETT is a program within DCNR.		
181.	F-4	13-19	SETT	SETT	It is unclear if this bullet pertains to both Nevada and Northeastern California. Language elsewhere indicates it should just apply to CA (p2-22, line 13), but there is no explicit language on pg F-4 line 13-19 stating such.		
182.	J-1		SETT	SETT	Step 2, #1: Change "or" to "and."		
183.	J-1		SETT	SETT	Step 2, #1 and 4: These two numbers seem duplicative. How are they intended to be different?		
184.	J-2		SETT	SETT	Step 4: change "SETT OR NDOW" to "SETT AND NDOW"		
185.	J-2		SETT	SETT	Step 5: Why is BLM not requiring the use of the CCS? In what circumstances would the BLM use a different mitigation system? What systems would the BLM consider? How would this be consistently applied? How would this provide any assurances to the USFWS?		
186.	J-2		SETT	SETT	Step 6: Why is BLM not requiring the use of the CCS? In what circumstances would the BLM use a different mitigation system? What systems would the BLM consider? How would this be consistently applied? How would this provide any assurances to the USFWS?		

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187.	J-3		SETT	SETT	Step 7-12: Why is BLM not requiring the use of the CCS? In what circumstances would the BLM use a different mitigation system? What systems would the BLM consider? How would this be consistently applied? How would this provide any assurances to the USFWS?		
188.	J-4		SETT	SETT	This diagram is blurry and difficult to read. Please fix.		

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