US Department of the Interior
Bureau of Land Management
Carson City District Office, Nevada

Resource Management Plan and
Environmental Impact Statement

SCOPING SUMMARY REPORT
DECEMBER 2012

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ACRONYMS AND ABBREVIATIONS

	Full Phrase
ACEC	Areas of Critical Environmental Concern
BLM	United States Department of the Interior, Bureau of Land Management
CCD	Carson City District Office
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act of 1976
NEPA	National Environmental Policy Act
planning area	all lands, regardless of ownership, within the United States Department of the Interior, Bureau of Land Management, Carson City District Office, Nevada
public lands	lands administered by the United States Department of the Interior, Bureau of Land Management
OHV	off-highway vehicle
RAC	Resource Advisory Council
RMP	resource management plan
US	United States
USC	United States Code

SUMMARY

The United States (US) Department of the Interior, Bureau of Land Management (BLM), Carson City District Office (CCD) is preparing a resource management plan (RMP) to provide updated management direction for BLM-administered lands. The CCD is responsible for the management and stewardship of approximately 4.8 million acres of public land within the Carson City RMP planning area in northwestern Nevada. The environmental effects of the RMP will be evaluated in compliance with the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) in an environmental impact statement (EIS) prior to plan implementation.

Public involvement is a vital component of an effective RMP/EIS process. Public involvement for the Carson City RMP includes public scoping and outreach; outreach to local stakeholders in the form of a public presentations; collaboration with federal, state, local, and tribal governments and a Resource Advisory Council (RAC); and public review of and comment on the Draft RMP/EIS. This report documents the results of the public and agency scoping and outreach process.

PUBLIC SCOPING ACTIVITIES

Public outreach for the Carson City RMP/EIS during the public scoping period has included: 1) a postcard mailed in February 2012 to over 630 agency officials, organizations, and members of the public; 2) 6 scoping open houses in March 2012 in Fallon, Yerington, Hawthorne, Minden, Reno, and Carson City, Nevada; 3) notices published in newspapers; and 4) a public website, http://www.blm.gov/nv/st/en/fo/carson_city_field.html, which provides access to materials distributed at scoping meetings as well as information on the public involvement process. The formal public comment period as required by NEPA began on February 24, 2012, with the publication of a Notice of Intent in the Federal Register and ended on April 29, 2012.

PUBLIC SCOPING RESULTS

The BLM received 291 unique written submissions (referred to as comment letters or letters throughout this report) yielding 1,692 discrete comments. In addition, 6 different form letters with a total of 3,543 submissions were received during the public scoping period. Comments were entered into a database, categorized, coded, tallied, and analyzed. Categories included RMP process categories, planning issues, and commenter affiliation.

Members of the general public submitted 250 comment letters (88 percent of the total) during the scoping period, organizations or non-profit groups submitted 24 comment letters (8.4 percent of the total), and businesses submitted 4 comment letters (1 percent of the total). Federal agencies submitted 1 comment letter (less than 1 percent of the total), state agencies submitted 3 comment letters (1 percent of the total), and local governmental agencies submitted 2 comment letters (less than 1 percent of the total); comments letters received from government agencies accounted for 2.5 percent of the total letters submitted. One comment letter (less than 1 percent of the total) was received from a tribal representative.

ISSUE SUMMARY

Based on internal (within the Carson City District Office) and external scoping, the following planning issues have been identified. Comments received were classified into the planning issues below and into subcategories for each issue.

Issue 1: Restoring Ecological Health

Issue 2: Air and Atmospheric Values

Issue 3: Water Resources

Issue 4: Cultural Resources, Native American Concerns and Paleontology Resources

Issue 5: Visual Resource Management

Issue 6: Special Status Species

Issue 7: Fish and Wildlife

Issue 8: Wild Horses and Burros

Issue 9: Fire Management

Issue 10: Livestock Grazing

Issue 11: Recreation and Visitor Services

Issue 12: Lands and Realty

Issue 13: Mineral Resources (includes Oil, Gas, Geothermal, Coal, Saleable, and Solid Leasable except coal), and Locatable

Issue 14: Hazardous Materials

Issue 15: Special Designations

Issue 16: Renewable Resources

Issue 17: Socio-Economics

Issue 18: Environmental Justice

Issue 19: Sustainable Development

Issue 20: Comprehensive Travel and Transportation Management

Issue 21: Cave and Karst Resources

Issue 22: Urban Growth

Issue 23: Forest/Woodland Management

Issue 24: Geology and Soils

Issue 25: Drought Management/Climate Change

Issue 26: Public Health and Safety

Issue 27: Other Resource Concerns

The BLM will use the planning issues to help guide the development of a reasonable range of alternative management strategies for the RMP. In addition to planning issues, comments also addressed issues that are policy or administrative actions, issues that have been or will be addressed by the Carson City District Office outside of the RMP, and issues that are outside the scope of the RMP.

FUTURE STEPS

Scoping is the first opportunity for public involvement in the RMP process. The CCD will use the information collected during the scoping period to formulate alternatives and prepare the Draft RMP/EIS, which is anticipated to be published in spring of 2014. Release of the Draft RMP/EIS will be announced by a Notice of Availability published in the *Federal Register,* and in the local media, and on the RMP website. Additional public meetings will be held to solicit public comment on the draft document.

At the conclusion of the public comment period, the Draft RMP/EIS will be revised, and a Proposed RMP/Final EIS will be published and made available for public review. While these are the specific opportunities for public involvement during the RMP process, the BLM welcomes input from the public throughout the RMP process.

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SECTION 1
INTRODUCTION

The United States (US) Department of the Interior, Bureau of Land Management (BLM), Carson City District Office (CCD) is preparing a resource management plan (RMP) and associated environmental impact statement (EIS) to guide management of BLM-administered public lands (surface lands and federal minerals) within the CCD. The RMP/EIS will be prepared as a dynamic and flexible plan to allow management to reflect the changing needs of the planning area and will replace the existing Carson City Consolidated Resource Management Plan, which was prepared in 2001. The CCD RMP planning area consists of approximately 9 million acres and comprises federal, state, and private lands, as well as Indian Reservations, The planning area includes 11 counties in northwestern Nevada and small portions of northeastern California. The BLM administers approximately 4.8 million acres of land within the planning area.

Under the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) and the Council on Environmental Quality's (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1501), federal agencies are required to consider the environmental effects of their actions prior to taking such actions. Actions that are subject to NEPA include projects and programs that are entirely or partially financed, assisted, conducted, regulated, or approved by federal agencies; new and revised agency rules, regulations, plans, policies, or procedures; and legislative procedures (40 CFR 1508.18). The actions proposed by the BLM as part of the Carson City RMP are subject to the requirements of NEPA.

1.1 PURPOSE OF AND NEED FOR THE RESOURCE MANAGEMENT PLAN

The BLM land use planning process yields a dual-functioning document: an RMP and an EIS. An RMP is a land use plan that describes broad multiple-use direction for managing public lands administered by the BLM. The Federal Land Policy and Management Act of 1976 (FLPMA) directs the BLM to develop such

land use plans to provide for appropriate uses of public land. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. These decisions establish goals and objectives (desired outcomes) for resource management and the measures needed to achieve them. These measures are expressed as actions and allowable uses (i.e., lands that are open or available for certain uses, including any applicable restrictions, and lands that are closed to certain uses). The EIS portion of the document identifies the environmental consequences of achieving the goals and objectives set forth in the RMP.

BLM-administered lands within the planning area are currently managed in accordance with the decisions in the 2001 Carson City Field Office Consolidated RMP (BLM 2001). This document, created through a plan maintenance action, incorporated decisions from eight existing planning documents and five plan amendments. Since 2001, the BLM has completed five amendments to the consolidated RMP, including the Alpine County (California) RMP amendment and environmental assessment in 2007.

CCD is developing a new RMP in response to changing needs in the planning area and new policies related to energy, protection of sensitive resources, conflicts between competing resources, increasing demand on limited resources, and many other issues not addressed in the 2001 plan. CCD's RMP will also ensure compliance with mandates and address current planning issues. In addition to planning concepts currently identified in the 2001 consolidated RMP, issues identified through a public scoping process will help inform the development of the new RMP.

To support the RMP preparation, the BLM will prepare an EIS that provides a comprehensive evaluation of the environmental issues and impacts. The NEPA requires the BLM to consider a range of alternatives in its planning process and to analyze and disclose the potential environmental impacts of proposed RMP decisions. The alternatives and impact analysis are documented in the EIS. The EIS process also provides opportunities for participation in RMP development by the public; other federal agencies, state, and local governments; and tribal governments. The RMP and EIS will be combined into one document.

1.2 DESCRIPTION OF THE RMP PLANNING AREA

The planning area encompasses approximately 9 million acres of federal, state, and private lands in eleven counties—Carson City, Churchill, Douglas, Lyon, Mineral, Nye, and Storey Counties in Nevada and Alpine, Lassen, and Plumas Counties in California. Refer to **Figure 1-1**, Carson City District Planning Area, for a map of the CCD RMP Planning Area. Within the planning area, there are many diverse communities with unique economic bases, values, and resources. Equally as diverse are the planning area's physiographic attributes, which include the pine-forested eastern slopes of the Sierra Nevada Mountains, the western

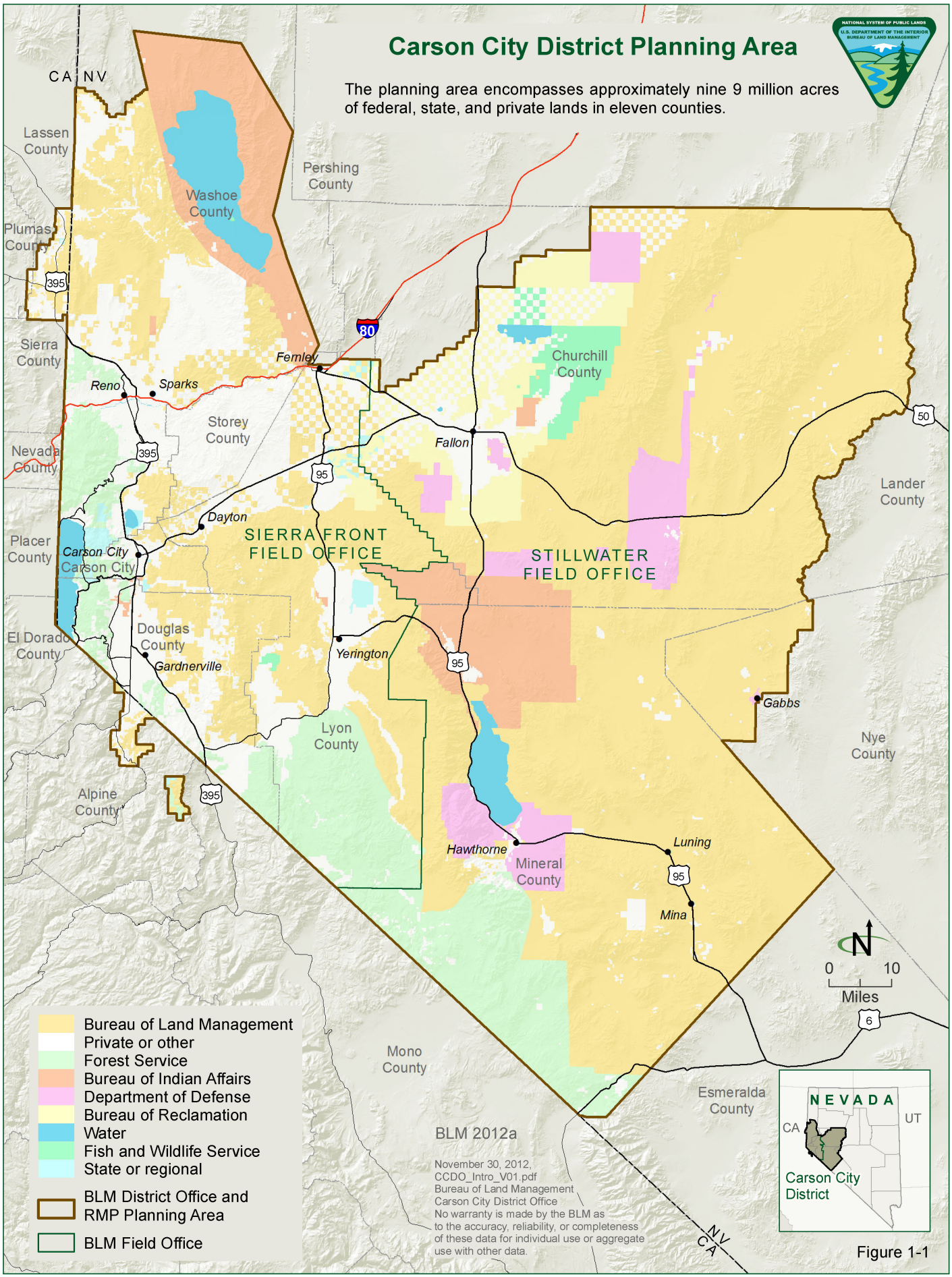
Carson City District Planning Area
The planning area encompasses approximately nine 9 million acres of federal, state, and private lands in eleven counties.
CA NV
Lassen County
Pershing County
Washoe County
Plumas County
Sierra County
Nevada County
Placer County
El Dorado County
Douglas County
Alpine County
Storey County
Churchill County
Lander County
Lyon County
Mineral County
Nye County
Mono County
Esmeralda County
Reno
Sparks
Fernley
Fallon
Dayton
Carson City
Gardnerville
Yerington
Hawthorne
Luning
Mina
Gabbs
SIERRA FRONT FIELD OFFICE
STILLWATER FIELD OFFICE
80
395
95
50
6
0 10
Miles
Bureau of Land Management
Private or other
Forest Service
Bureau of Indian Affairs
Department of Defense
Bureau of Reclamation
Water
Fish and Wildlife Service
State or regional
BLM District Office and RMP Planning Area
BLM Field Office
BLM 2012a
November 30, 2012, CCDO_Intro_V01.pdf
Bureau of Land Management
Carson City District Office
No warranty is made by the BLM as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.
NEVADA
CA
UT
Carson City District
NV
CA

Figure 1-1

reaches of the Great Basin high desert (basin) and range topography, and vast expanses of sagebrush and desert shrub rangelands. Management direction outlined in the RMP will apply to the 4.8 million acres of public lands within the planning area boundary administered by the BLM.

1.3 OVERVIEW OF PUBLIC INVOLVEMENT PROCESS

Public involvement is a vital and legal component of the RMP and EIS processes. Public involvement vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR Section 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in the NEPA process. Section 202 of FLPMA directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on public lands. Guidance for implementing public involvement during land use planning actions on public lands can be found in the BLM's Land Use Planning Handbook (H-1601-1) (BLM 2005). Public involvement requirements of both NEPA and FLPMA will be satisfied through this joint RMP/EIS process.

Public involvement for the CCD RMP/EIS is being conducted in the following four phases:

- Public scoping before NEPA analysis begins to determine the scope of issues and alternatives to be addressed in the RMP/EIS
- Public outreach via newsletters, news releases, and newspaper advertisements
- Collaboration with federal, state, local, and tribal governments; the BLM Sierra Front – Northwestern Great Basin Resource Advisory Council (RAC); and cooperating agencies
- Public review of and comment on the Draft RMP/EIS, which analyzes likely environmental effects and identifies the BLM's preferred alternative

This scoping summary report documents the results of the first two phases of the public involvement process and provides information about the ongoing collaboration process.

Scoping is an early and open process for determining the scope of issues to be addressed and identifying the significant issues related to a proposed action. Information collected during scoping may also be used to develop the alternatives to be addressed in a NEPA document. The process has two components: internal scoping and external scoping. Internal scoping is conducted within an agency or cooperating agencies to determine preliminary and anticipated issues and concerns. An interdisciplinary team of resource specialists from CCD held internal scoping meetings to identify the anticipated

planning issues and the methods, procedures, and data to be used in compiling the RMP/EIS.

External scoping is a public process designed to reach beyond the BLM and identify the concerns of high importance to the public. External scoping helps ensure that real problems are identified early and properly studied, that issues of no concern do not consume time and effort, and that the proposed action and alternatives are balanced, thorough, and able to be implemented.

In accordance with 43 CFR 1610.2(d), the BLM must document the scoping results. The BLM's land use planning guidance (Handbook H-1601-1 [BLM 2005]) requires the preparation of a Scoping Summary Report to capture public input in one document. This report must summarize the separate comments received during the formal external scoping period. It also must describe the issues and management concerns from public scoping meetings, internal scoping meetings, and the pre-plan analysis. The report must also include a discussion of how these comments will be incorporated into the RMP.

1.4 Description of the Scoping Process

The BLM follows the public involvement requirements documented in CEQ regulations implementing NEPA (40 CFR 1501.7 for scoping and 1506.6 for public involvement). The BLM also follows public involvement requirements described in the BLM's planning regulations (43 CFR 1601-1610). The BLM solicits comments from relevant agencies and the public, organizes and analyzes all comments received, and then distills them to identify issues that will be addressed during the planning process. These issues define the scope of analysis for the RMP and are used to develop the project alternatives.

1.4.1 Postcard and Mailing List

In February 2012, the BLM mailed a postcard announcing the start of the public scoping period for the CCD RMP/EIS to more than 630 individuals from the public, agencies, and organizations who had participated in past CCD activities and had been included on past CCD distribution lists. The postcard provided the dates and venues for the six scoping open houses (Fallon, Yerington, Hawthorne, Minden, Reno, and Carson City; see **Section 1.4.6**, Scoping Open Houses) and described the various methods for submitting comments, including dedicated e-mail and postal addresses. The BLM will publish future postcards or newsletters at major project milestones and will mail them to individuals and organizations that have requested to remain on or be added to the project mailing list. All newsletters will be posted on the project website (http://www.blm.gov/nv/st/en/fo/carson_city_field.html). Participants may request to receive newsletters and other project information through electronic or postal mail. The postcard is included in **Appendix A**, Scoping Materials.

1.4.2 Press Release and Newspaper Advertisements

A press release was posted on the project website (http://www.blm.gov/nv/st/en/fo/carson_city_field.html) on February 24, 2012,

announcing the Notice of Intent for the CCD RMP/EIS process. It also provided information on the six scoping open houses (see **Section 1.4.6**, Scoping Open Houses) and described the various methods for submitting comments. The press release was sent out electronically to over 130 different media outlets. Additionally, the public was notified via social media sites such as Facebook and Twitter on February 24 2012 and March 27 & 29, 2012.

A newspaper advertisement was published in 7 local newspapers March 2012 prior to the scoping meetings. **Table 1-1**, Newspaper Advertisement Publication Dates, displays the date each newspaper published the advertisement. This newspaper advertisement announced the original six scoping open houses (see **Section 1.4.6**, Scoping Open Houses). The newspaper article and press releases are included in **Appendix A**, Scoping Materials.

Table 1-1
Newspaper Advertisement Publication Dates

Newspaper	Date(s) Advertisement Appeared
Nevada Appeal	February 29, 2012
Mason Valley News	March 2, 2012
Reno Gazette	March 2, 2012
Dayton Courier	March 3, 2012
Nevada Appeal	March 5, 2012
Mineral County Independent	March 7, 2012
Nevada Appeal	March 25, 2012
Reno Gazette	March 25, 2012

1.4.3 Flyer

A flyer announcing the dates and locations of the original six scoping open houses (see **Section 1.4.6**, Scoping Open Houses) was posted at libraries in Douglas, Washoe, Storey, Alpine, Plumas, and Lassen Counties. The flyer is included in **Appendix A**, Scoping Materials.

1.4.4 Project Website

A public website was launched and is regularly updated to provide the public with the latest information about the RMP/EIS process. The website, available on the Internet at http://www.blm.gov/nv/st/en/fo/carson_city_field.html, provides background information about the project, applicable documents and reports, a project timeline, information about the RMP process, meeting information, and contact information. The dates and locations of all 6 scoping meetings and 19 RMP presentations were announced on the website.

1.4.5 Scoping Open Houses

The BLM hosted six scoping meetings to provide the public with opportunities to become involved, learn about the project and the planning process, meet the RMP team members, and offer comments. Meetings were advertised via press release, newspaper advertisements, the project newsletter, the project website, and a flyer posted in various locations throughout the planning area. The locations of the open houses are provided in **Table 1-2**, Scoping Open Houses.

Table 1-2
Scoping Open Houses

Location (All Nevada)	Venue	Date	Number of Attendees	Number of Completed Comment Forms Received
Fallon	Fallon Convention Center	March 13, 2012	24	0
Yerington	Lyon County Library	March 14, 2012	21	0
Hawthorne	Mineral County Library	March 15, 2012	17	0
Minden	Carson Valley Inn	March 27, 2012	31	2
Reno	Hyatt Place	March 28, 2012	202	5
Carson City	Carson City Library	March 29, 2012	54	2
Total			**349**	**9**

Note: Meetings were from 4:00 to 6:00 pm in Fallon, Yerington and Hawthorne and from 5:00 to 7:00 pm in Reno, Carson City and Minden.

Scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with BLM staff representatives. Blank scoping comment forms were available at the sign-in station. Resource stations displayed resource maps and information to illustrate the current situation and management techniques practiced among different resources and land areas. Twenty-five scoping fact sheet handouts were available for participants at each meeting. Each two-page fact sheet provided basic information on the resource area, current management practices, and the fundamental planning issues applicable to the resource. As shown in **Table 1-2**, Scoping Open Houses, 349 people attended the open houses and 9 comment forms were submitted during the scoping meetings. In addition to the individual comment letters submitted at the meetings, two petitions or form letters with 57 and 275 signatures, respectively, were submitted at the Reno meeting. These letters have been assessed and calculated with the other form letters submitted during scoping.

1.4.6 Notice of Intent

The Notice of Intent notifies the public of the BLM's intent to develop the CCD RMP. Publication of the Notice of Intent in the *Federal Register* initiates the formal public scoping comment period, as required by NEPA. The Notice of Intent was published on February 24, 2012, and the official 60-day scoping comment period ended on April 29, 2010. Comments received on or before May 5, 2012, are included in this report. The BLM will consider all comments

received during the planning process, both before and after the publication of the Notice of Intent. The Notice of Intent is posted on the project website http://www.blm.gov/nv/st/en/fo/carson_city_field.html.

1.5 Collaborative Involvement Process

In addition to formal scoping, the BLM has implemented an extensive collaborative outreach and public involvement process that will include working closely with cooperating agencies and the Sierra Front – Northwestern Great Basin RAC. These efforts are summarized below. The BLM will continue to meet with interested agencies and organizations throughout the planning process, as appropriate, and will coordinate closely with cooperating partners.

1.5.1 Community Presentations

The BLM provided 38 RMP presentations from early-April to mid-October 2012. These presentations outlined the CCD's RMP objectives and provided an opportunity for participants to express their vision for the process, including the benefits they seek from public lands. The gatherings also identified strategic planning options and laid the foundation for an on-going collaborative relationship for the RMP effort. **Table 1-3**, RMP Presentations, lists the organizations that received the presentations.

Table 1-3
RMP Presentations

Date	Presentation Recipient
April 3, 2012	Alpine County Board of Supervisors
April 18, 2012	Mineral County Commissioners
April 18, 2012	Churchill County Commissioners
April 19, 2012	NV Trail Stewards
April 24, 2012	Bridgeport Indian Colony Tribal Council
April 24, 2012	Lovelock Indian Colony
April 25, 2012	Susanville Indian Rancheria
May 7, 2012	Reno-Sparks Indian Colony Tribal Council
May 9, 2012	Yerington Paiute Tribal Council
May 10, 2012	Walker River Paiute Tribal Council
May 11, 2012	Yomba Shoshone Tribal Council
May 11, 2012	Washoe Tribe of NV and CA Tribal Council
May 22, 2012	Fallon Shoshone Paiute Tribal Council
June 5, 2012	Storey County Commissioners
June 13, 2012	NV All State Trail Riders
June 14, 2012	Sierra Front-Northwestern Great Basin Resource Advisory Council
June 18, 2012	Carson City Advisory Board to Manage Wildlife
June 20, 2012	Backcountry Horseman (High Sierra Chapter)
July 3, 2012	Nye County Commissioners
July 17, 2012	Alpine County Board of Supervisors
July 18, 2012	Mineral County Commissioners
July 18, 2012	Churchill County Commissioners
July 19, 2012	Lyon County Commissioners
August 2, 2012	Carson City Board of Supervisors

Table 1-3
RMP Presentations

Date	Presentation Recipient
August 2, 2012	Douglas County Commissioners
August 3, 2012	Pyramid Lake Paiute Tribe
August 15, 2012	Mineral County Commissioners
August 15, 2012	Churchill County Commissioners
August 21, 2012	Lassen County Board of Supervisors
August 28, 2012	Washoe County Commissioners
September 17, 2012	Carson River Advisory Committee
September 19, 2012	Backcountry Horseman (Reno Chapter)
September 19, 2012	Mineral County Commissioners
September 19, 2012	Churchill County Commissioners
September 24, 2012	Carson City Open Space Advisory Committee
October 17, 2012	Mineral County Commissioners
October 17, 2012	Churchill County Commissioners
October 18, 2012	Lyon County Commissioners

1.5.2 Cooperating Agencies

A cooperating agency is any federal, state, or local government agency or Indian tribe that enters into a formal agreement with the lead federal agency to help develop an environmental analysis. More specifically, cooperating agencies "work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks" (BLM Land Use Planning Handbook H-1601-1 [BLM 2005]). The benefits of enhanced collaboration among agencies in preparing NEPA analyses are:

- Disclosing relevant information early in the analytical process
- Applying available technical expertise and staff support
- Avoiding duplication with other federal, state, tribal, and local procedures
- Establishing a mechanism for addressing intergovernmental issues

On February 29 and March 5, 2012, the BLM wrote to 48 local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies for the CCD RMP (**Table 1-4**, Cooperating Agency Participation).

Table 1-4
Cooperating Agency Participation

Agencies and Tribes Invited to be Cooperators	Accepted as of October 2012
US Department of the Interior, Fish and Wildlife Service	
US Department of the Interior, Bureau of Reclamation	X
US Department of Agriculture, National Forest Service	X
US Environmental Protection Agency	
US Department of Defense – Fallon Naval Air Station	Pending
US Department of Defense – NV Army National Guard	X
US Department of Defense – US Marine Corps Mountain Warfare Training Center	X
US Department of Defense – Hawthorne Army Depot	X
Nevada Division of State Lands	
Nevada Division of Minerals	
Nevada Department of Wildlife	X
Washoe County	X
Storey County	
Douglas County	X
Lyon County	
Churchill County	X
Mineral County	X
Nye County	X
Carson City	X
Sierra County	n/a
Alpine County	X
Plumas County	
Lassen County	
City of Reno	
City of Sparks	
City of Fernley	
City of Yerington	
City of Fallon	
Town of Gardnerville	
Town of Minden	
Washoe Tribe	
Reno Sparks Indian Colony	
Bridgeport Indian Colony	X
Susanville Indian Rancheria	
Lovelock Indian Colony	
Yerington Paiute Tribe	
Walker River Paiute Tribe	
Fallon Shoshone Paiute Tribe	
Yomba Shoshone Tribe	
Pyramid Lake Paiute Tribe	X

As of December 2012, 15 agencies have agreed to participate in the RMP as designated cooperating agencies. Once the cooperating agencies have all signed Memoranda of Understanding with the CCD, the BLM will arrange quarterly meetings to seek input throughout the RMP process.

1.5.1 Resource Advisory Council

A RAC is a committee established by the Secretary of the Interior to provide advice or recommendations to BLM management (BLM Land Use Planning Handbook H-1601-1 [BLM 2005]). A RAC is generally composed of 15 members of the public representing different areas of expertise. The Sierra Front – Northwestern Great Basin RAC includes 15 members appointed to represent three interest groups: (1) commercial; (2) environmental, dispersed recreation, archaeological/historic, wild horse and burro interest; and (3) elected official, Native American, public-at-large, state agency, academic. The Sierra Front-Northwestern Great Basin RAC provides input on public management issues within the Carson City and Winnemucca District Office boundaries. Recommendations are provided at the request of the Designated Federal Officer and address the topics of land use planning, recreation fees, and the classification, retention, management, and disposal of public lands within the RAC's advisory boundaries.

On March 5, 2012, the Sierra Front – Northwestern Great Basin RAC was notified of the project and the scoping meetings and will continue to provide input throughout the RMP process.

1.5.2 Collaboration and Consultation with Tribes

The CCD has initiated consultation with tribes that are identified as having interests or Traditional Cultural Properties in the planning area. Consultation will follow requirements of the National Historic Preservation Act and the American Indian Religious Freedom Act. The identified tribal governments are: Washoe Tribe of Nevada and California (California and Nevada), Reno Sparks Indian Colony (Nevada), Bridgeport Paiute Indian Colony (California), Susanville Indian Rancheria (California), Lovelock Indian Colony (Nevada), Yerington Paiute Tribe (Nevada), Walker River Paiute Tribe (Nevada), Fallon Shoshone Paiute Tribe (Nevada), Yomba Shoshone Tribe (Nevada), and Pyramid Lake Paiute Tribe (Nevada).

RMP presentations were provided to all tribal governments listed above. Government-to-government consultation will continue throughout the RMP process to ensure that the concerns of tribal groups are considered in development of the RMP.

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SECTION 2
COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received on or before May 5, 2012, were evaluated and are documented in this Scoping Summary Report. All comments received during the RMP process will be considered in alternative formulation and project planning.

A total of 291 unique comment letters, resulting in 1,692 unique comments, were received during the public scoping period. The most common format used for letters was e-mail. Comment letters were also hand-delivered to the CCD, mailed via US Mail, or faxed. In addition, comment forms were completed at the public scoping meetings.

In addition to individual comment letters, letter campaigns from non-profit organizations and organized groups resulted in form letter submissions for a number of topics. Details of form letter submissions are included in **Appendix B**, List of Commenters, **Table B-2**, Form Letter Submissions. A master form letter for each of the various form letters was included in the comment-tracking database. Letters that represented slight variations of a form letter without significant additional information were treated as form letters. When significant unique comments were added to a form letter, these comments were entered into the comment-tracking database. In total, six different form letters were received. One letter was submitted by 11 individuals interested in the Canoe Hill Trail system, identified as form letter CH. One letter was submitted by 316 individuals interested in the Sand Mountain Recreation Area and is identified as form letter SM. Another form letter focused on off-highway vehicle (OHV) use and recreation on BLM-administered lands, identified as form letter OHV, was submitted and included 57 names. One form letter was submitted by 5 individuals interested in mountain biking, identified as form letter MB. The other 2 letters were submitted by individuals interested in wild horses and burros. The organizations are not known, and the form letters were given the identifiers 'WHA' and 'WHB'. WHA form letter had a total of 3,121 submissions, while

WHB had 33 submissions. Form letters are not included in the calculations of affiliation and geographic location percentages.

A list of commenters and the dates of submittal are provided in **Appendix B**, List of Commenters. Most comment letters included more than one comment. The 291 individual letters and master copy of each form letter yielded 1,692 discrete comments. The comment forms provided instructions for requesting confidentiality and for withholding individual names or addresses from public review or disclosure under the Freedom of Information Act.

To ensure that public comments were properly registered and that none were overlooked, a multi-phase management and tracking system was used. First, written submissions were logged and numbered. Once all comments were received and documented, the BLM assigned a planning classification to each issue. These classifications detail which issues raised will be resolved through the current planning effort. Planning classifications are as follows:

1: Issues that will be resolved in the RMP

2: Issues that will be addressed through BLM policy or administrative action (National and BLM policy)

3: Issues that are beyond the scope of this RMP that will be considered but not addressed

4: Issues that have already been addressed by the CCD but should be better communicated to the issue holder

To assist with the analysis, the BLM entered comments into the Public Input and Comment Tracking database and organized comments by planning issue categories and affiliation of the commenter. Finally, these identifiers were queried and tallied to provide information on planning and other issue categories. Details of comments received by planning issue are included in **Section 2.2.4**, Number of Comments by Planning Issue Category.

2.2 SUMMARY OF PUBLIC COMMENTS RECEIVED

2.2.1 Written Submissions by Affiliation

Table 2-1, Comments by Commenter Affiliation, and **Figure 2-1**, Comments by Commenter Affiliation, show the number and proportion of unique comment letters received from each type of affiliation (form letters, including master form letters, are not reflected in commenter affiliation). Letters on business, agency, or organization letterhead, or where the commenter signed using their official agency title, were considered to represent that organization. All other letters were considered to represent individuals. Members of the general public provided 87.7 percent of the comments received during the scoping period, representatives from non-profit or citizen groups submitted 8.4 percent, and representatives from businesses submitted 1.4 percent of the comments received during the scoping period. Federal agencies submitted 1 written

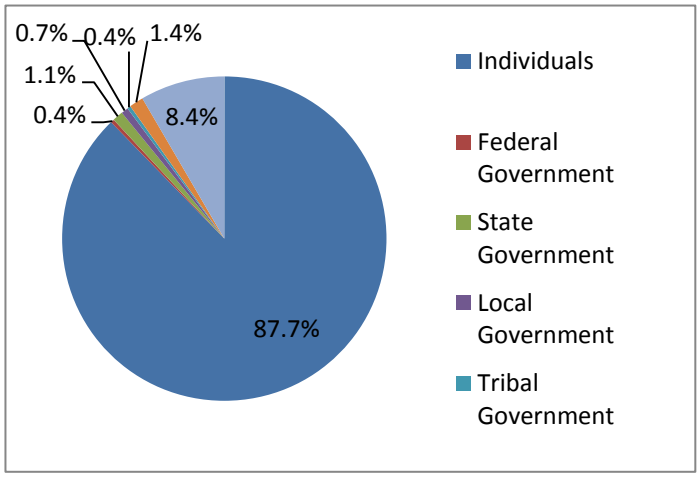
comment (less than 1 percent), state agencies submitted 3 written comments (1 percent), local governmental agencies submitted 2 written comments (less than 1 percent), and tribal governments submitted 1 written comment (less than 1 percent); government agencies accounted for a total of 2.5 percent of total submissions. A list of commenters, their affiliations, and the submittal date of their comments are listed in **Appendix B**, List of Commenters.

Table 2-1
Comments by Commenter Affiliation[1]

Affiliation	Number of Comment Letters	Percentage of Total Comment Letters
Government	7	2.5
Federal	*1*	*0.4*
State	*3*	*1*
Local	*2*	*0.7*
Tribal	*1*	*0.4*
Businesses	4	1.4
Organizations/Non-profits	24	8.4
Individuals	250	87.7
Total	**285**	**100**

[1]Calculations do not include form letters submissions, including master form letters.

Figure 2-1 Comments by Commenter Affiliation[1]



[1]Calculations do not include form letters submissions, including master form letters.

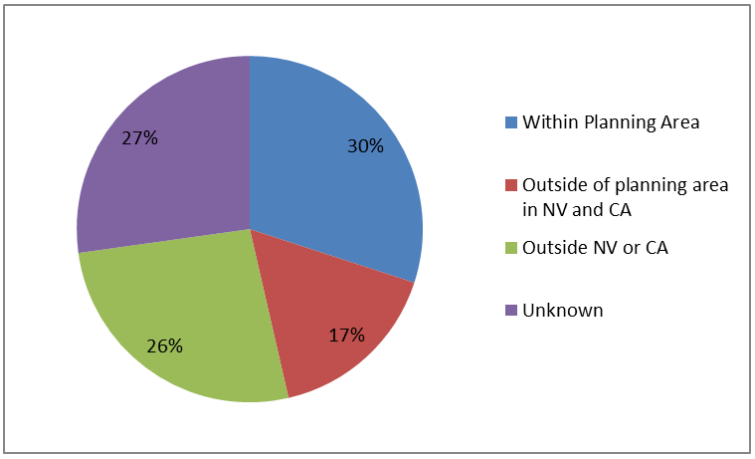
2.2.2 Written Submissions by Geographic Area

Table 2-2, Commenters by Geographic Area, and **Figure 2-2**, Commenters by Geographic Area, show the number and proportion of written submissions received by the geographic location of the sender. The assessment of submissions by geographic area was calculated for 250 individuals and does not include form letter submissions, or submissions from the 24 organizations, 4 businesses, or 7 government entities. Of the 250 individual commenters, a total of 75 commenters (30 percent) were from counties within the planning area. Of the remaining commenters, 41 (16.4 percent) were commenters in other counties in Nevada or California, and 66 commenters (26.4 percent) were from other states. One commenter was from Canada, and 68 (27.2 percent) of the 250 individual submissions received did not indicate a geographic origin. Note that these calculations do not include form letters submissions or submissions from government entities or other organizations.

Table 2-2
Commenters by Geographic Area

Location	Number of Commenters	Percentage of Total Commenters
Within Planning Area	75	30
Outside Planning Area, within NV or CA	41	16.4
Outside NV and CA	66	26.4
Unknown	68	27.2
Total	**250**	**100**

Figure 2-2 Commenters by Geographic Area



Commenter location within the planning area was further examined by city. In the planning area, Reno (33 percent), Carson City (12 percent), Sparks (11 percent), and Gardnerville (11 percent), had the highest number of commenters. Refer to **Table 2-3**, Commenter Location within the Planning Area.

Table 2-3
Commenter Location within the Planning Area

Location	Number of Commenters	Percentage of Total Commenters
Reno	25	33.3
Carson City	9	12
Sparks	8	10.7
Gardnerville	8	10.7
Fallon	7	9.3
Minden	4	5.3
Dayton	4	5.3
Other	10	13.3
Total	**75**	**100**

2.2.3 Number of Comments by Process Category

Table 2-4, Comments by Process Category, shows the number of issues raised that will or will not be addressed in the RMP. Of the 1,692 comments received, 1,212 (71.6 percent) were related to a planning issue that will be addressed in the RMP. While some comments addressed multiple planning issues, one primary category was selected for analysis. These comments are discussed in detail below and in **Section 3**, Issue Summary. In addition, 443 comments (26 percent) were related to issues that will be addressed in the RMP but do not fall within a specific planning issue category. These comments included general comments on the RMP planning process, alternatives development, collaboration, cumulative impacts and projects, comments on the environmental setting, comments on conducting impact analysis, and comments suggesting preliminary planning criteria (see **Section 3.3.7**, Other Issues to Be Addressed in the RMP). Out of the remaining comments, 37 of the comments (2.2 percent) were: issues beyond the scope of the RMP (19 comments or 1.1 percent), issues that will be resolved through national policy or administrative action (13 comments or 0.8 percent), or comments related to implementation-level decisions (5 comments or 0.3 percent). See **Section 3.4**, Issues That Will Not Be Addressed in the RMP, for more detail.

Comments are provided in **Appendix C**, Comments by Resource Planning Issue. Comment letters can be viewed in their entirety at the Carson City District Office in Carson City, Nevada.

Table 2-4
Comments by Process Category

Process Category Code	Percent of Comments	Number of Comments
Planning issue	71.6	1,212
General comment related to project	16.5	279
Impact Analysis	3.2	54
Public and Agency Collaboration	2.8	47
Alternative Development	1.8	31
Environmental Setting	1.2	20
Cumulative Impacts	0.4	7
Preliminary Planning Criteria	0.3	4
General issue beyond the scope of the RMP	1.1	19
Implementation-level decisions	0.3	5
Issue resolved through national policy	0.8	13
Total	**100**	**1,692**

2.2.4 Number of Comments by Planning Issue Category

Table 2-5, Comments by Planning Issue, show the number and proportion of comments received by planning issue category. The BLM received 1,212 planning issue comments and categorized them into the 27 planning issue categories and the appropriate subcategories. The categories include 23 planning issues that were identified by the BLM during internal scoping as well as 4 additional issues identified during public scoping. **Section 3**, Issue Summary, provides a detailed analysis of the comments received for each planning issue category and subcategory.

Of the planning issue comments, 295 (24.3 percent) pertained to Issue 8, wild horses and burros. The issue with the second highest number of comments was Issue 11, recreation and visitor services, with 248 comments (20.5 percent). This category includes comments on OHV and other types of trails use. Issue 20, comprehensive travel and transportation management had the third highest number of comments with 157 comments (13 percent). This category also includes comments on OHV and other types of trail use. Issue 2, air and atmospheric values, received the fewest comments with 1 (0.1 percent of planning issue comments).

Table 2-5
Comments by Planning Issue

Planning Issue and Subcategory	Number of Comments	Percent of Comments
Issue 1. Restoring Ecological Health	**61**	**5.0**
All Vegetation		3.4
General	*25*	*2.1*
Sagebrush Steppe	*3*	*0.2*
Weeds	*13*	*1.1*
Wetland and Riparian Vegetation	7	0.6
General comment related to biological resources	13	1.1
Issue 2. Air and Atmospheric Values	**1**	**0.1**
Air Quality	1	0.1
Issue 3. Water Resources	**35**	**2.9**
Issue 4. Cultural Resources, Native American Concerns and Paleontology Resources	**17**	**1.4**
Cultural and Heritage Resources	10	0.8
Paleontological Resources	2	0.2
Tribal Interests and Native American Religious Concerns	5	0.4
Issue 5. Visual Resource Management	**5**	**0.4**
Issue 6. Special Status Species-Wildlife	**57**	**4.7**
Wildlife	17	1.4
Sage-Grouse	40	3.3
Issue 7. Fish and Wildlife	**23**	**1.9**
Aquatic	1	0.1
Birds	3	0.2
General	18	1.5
Terrestrial	1	0.1
Issue 8. Wild Horses and Burros	**295**	**24.3**
Issue 9. Fire Management	**11**	**0.9**
Issue 10. Livestock Grazing	**94**	**7.7**
Issue 11. Recreation and Visitor Services	**248**	**20.5**
Recreation (including SRMAs)	248	20.5
Issue 12. Lands and Realty	**36**	**3.0**
Public Lands	30	2.5
General Development	4	0.3
Transportation Facilities	1	0.1
Utilities	1	0.1
Issue 13. Mineral Resources (includes Oil, Gas, Geothermal, Coal, Saleable, and Solid Leasable except coal), and Locatable	**40**	**3.3**
Minerals and Mining	25	2.1
Energy Development-Geothermal	6	0.5
Energy Development-Oil and Gas	1	0.1

Table 2-5
Comments by Planning Issue

Planning Issue and Subcategory	Number of Comments	Percent of Comments
Energy Development-General	8	0.7
Issue 14. Hazardous Materials	**3**	**0.2**
Issue 15. Special Designations	**46**	**3.8**
Special management areas excluding ACECs and SRMAs (e.g., State Management Areas, Wild and Scenic Rivers, Wilderness Study Area, Wilderness, etc.)	28	2.3
Area of Critical Environmental Concern	14	1.1
National Historic Trails and Scenic Byways	4	0.3
Issue 16. Renewable Resources	**11**	**0.9**
Energy Development - Renewable	11	0.9
Issue 17. Socio-Economics	**36**	**3.0**
Issue 18. Environmental Justice	**0**	**0**
Issue 19. Sustainable Development	**0**	**0**
Issue 20. Comprehensive Travel and Transportation Management	**157**	**13.0**
Issue 21. Cave and Karst Resources	**0**	**0**
Issue 22. Urban Growth	**7**	**0.6**
Urban Interface	7	0.6
Issue 23. Forest/Woodland Management	**5**	**0.4**
Issue 24: Geology and Soils	**9**	**0.7**
Geology	1	0.1
Soils	8	0.6
Issue 25: Drought Management/Climate Change	**5**	**0.4**
Issue 26: Public Health and Safety	**8**	**0.7**
Issue 27: Other Resource Concerns	**2**	**0.2**

SECTION 3
ISSUE SUMMARY

Issue identification is the first of the nine-step BLM planning process. As defined in the BLM Land Use Planning Handbook (H-1601-1) (BLM 2005), planning issues include concerns or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include concerns, needs, and resource use, development, and protection opportunities to consider in RMP preparation. These issues may stem from new information or changed circumstances and from the need to reassess the appropriate mix of allowable uses.

3.1 PLANNING ISSUE DEVELOPMENT

The BLM enacted a multi-step issue identification process for the CCD RMP planning effort. The process began with the creation of a Preparation Plan for the CCD RMP/EIS in January 2012. This plan, used by the interdisciplinary team to begin the planning process, summarized the purpose of and need for the RMP. It also highlighted anticipated planning issues, management concerns, and preliminary planning criteria developed by the BLM interdisciplinary team during internal scoping.

Public scoping began with a postcard mailing in February 2012, followed by scoping workshops in March 2012. In February 2012, the BLM issued the Notice of Intent to prepare the RMP, which initiated the formal scoping period as required by NEPA, and solicited written comments from the public (further discussed in **Section 1.4**, Description of the Scoping Process). Scoping is a collaborative public involvement process implemented to identify and refine planning issues to address in the planning process. During the scoping period, the BLM also engaged tribes and cooperating agencies, as discussed in **Section 1.5**, Collaborative Involvement Process. The BLM hosted six open houses and solicited written comments from the public during the scoping period. The scoping period provided the BLM additional information on the public's concerns and suggestions regarding the planning area.

Information accepted during internal and external scoping was compiled to develop discrete planning issue statements. These are discussed in **Section 3.2**, Planning Issue Statements. The purpose of these planning issue statements is to highlight the key issues distilled from the initial planning and scoping processes. The issues are also discussed in **Section 3.3**, Summary of Public Comments by Resource Planning Issue Category, according to the various issue categories and associated comments received from interested individuals, agencies, elected officials, businesses, and organizations. The BLM will use the planning issues and associated statements, planning criteria, and other information collected in the early planning and scoping phases of the RMP process to help formulate a reasonable range of alternative management strategies that will be analyzed during the RMP/EIS process.

3.2 PLANNING ISSUE STATEMENTS

A planning issue is a conflict or dispute over resource management activities, allocations, or land use that is well defined or topically discrete and entails alternatives between which to choose. Planning issue statements were identified by the BLM and through public scoping.

The planning issue statements presented below are preliminary and based on the best information known to date. The process of developing this RMP will afford many opportunities for collaboration with local, state, federal, and tribal governments; land-management agencies; public interest groups; and public land users. As a result, these issues and concerns may need to be modified and perfected to reflect public comments and concerns. The overarching planning issues the CCD will address in the plan are listed below. Each overarching issue, in turn, has several sub-topics, issue questions, and management concerns which address more specific uses and resources. As applicable, items listed in Appendix C of the Land Use Planning Handbook (H-1601-1) (BLM 2005) will be addressed and decisions will be made. Planning issues include the following:

Issue 1: Restoring Ecological Health

Issue 2: Air and Atmospheric Values

Issue 3: Water Resources

Issue 4: Cultural Resources, Native American Concerns and Paleontology Resources

Issue 5: Visual Resource Management

Issue 6: Special Status Species

Issue 7: Fish and Wildlife

Issue 8: Wild Horses and Burros

Issue 9: Fire Management

Issue 10: Livestock Grazing

Issue 11: Recreation and Visitor Services

Issue 12: Lands and Realty

Issue 13: Mineral Resources (includes Oil, Gas, Geothermal, Coal, Saleable, and Solid Leasable except coal), and Locatable

Issue 14: Hazardous Materials

Issue 15: Special Designations

Issue 16: Renewable Resources

Issue 17: Socio-Economics

Issue 18: Environmental Justice

Issue 19: Sustainable Development

Issue 20: Comprehensive Travel and Transportation Management

Issue 21: Cave and Karst Resources

Issue 22: Urban Growth

Issue 23: Forest/Woodland Management

Issue 24: Geology and Soils

Issue 25: Drought Management/Climate Change

Issue 26: Public Health and Safety

Issue 27: Other Resource Concerns

These preliminary issue categories encompass many of the issues and concerns identified by the public during scoping; however, they were not intended to be all inclusive. These issues will be presented as questions that will be addressed through the RMP. These issues will likely be modified, new issues will be added, and others will be deleted as a result of the public involvement process. Preliminary management concerns for each of the issues developed by the BLM during internal scoping are included below.

Issue No. 1: Restoring Ecological Health

- What areas should BLM prioritize for restoration activities?
- Under what conditions should the BLM use non-native plants in place of native plants for restoration activities?
- What descriptions should be developed for Desired Plant Communities?
- What criteria should the BLM use to apportion the forage allocated among wildlife, livestock, and wild horses and burros?
- How will the BLM manage areas occupied by invasive species to prevent their dominance and provide for desired plan communities?

- What areas should the BLM prioritize for wetlands and riparian management?
- What criteria will be used to prescribe management actions in wetland and riparian areas?

Issue No. 2: Air and Atmospheric Values

- How will the BLM address air quality in nonattainment areas?
- How will the BLM address the effects climate change has on the natural resources?

Issue No. 3: Water

- How will the BLM protect, maintain, or enhance water quality and quantity?
- How will the BLM manage public lands to protect class waters and water bodies with state water quality standards?
- How will the BLM manage water rights?

Issue No. 4: Cultural Resources, Native American Concerns and Paleontology

- How will the BLM develop and manage baseline information for cultural resources, Native American traditional use areas, and paleontological resources?
- How will the BLM ensure management of cultural and paleontological resources for present and future generations in ways consistent with their scientific, educational, recreational, and traditional uses?
- How should cultural and paleontological sites, especially those open to interpretation and recreation, be monitored, preserved and protected?
- How will the BLM ensure tribal access to natural and traditional resources?

Issue No. 5: Visual Resource Management

- Based on a Visual Resource Management inventory and management considerations for public land uses and allocations (e.g. renewable energy considerations), how should Visual Resource Management classes be established?
- What are current and potential conflicts with managing Visual Resource Management values, and how can they be mitigated?

Issue No. 6: Special Status Species (includes Threatened, Endangered and Sensitive Status Species)

- How will the BLM manage habitat of Special Status Species found on public lands to ensure the continued existence of these species,

including development of guidance criteria for habitat and species protection?

- What areas should be identified as important habitat for Special Status Species?
- Is the current Carson wandering skipper ACEC boundary appropriate?
- Should the RMP identify a new Carson wandering skipper ACEC in the Hot Springs Mountain area?
- How should the BLM manage historic Lahontan Cutthroat Trout streams that are not identified in the 1995 Lahontan Cutthroat Trout Recovery Plan?

Issue No. 7: Fish and Wildlife

- What are the criteria to be used in considering historical bighorn sheep areas for reintroductions and management?
- Fish and wildlife are considered a major use in FLPMA; how will fish and wildlife be proactively managed?
- How will the BLM address wildlife species that pioneer into new areas?
- When would and which criteria would be used by the BLM to authorize introductions, reintroductions, or augmentations of wildlife and plant species?
- Should the BLM continue to allow domestic sheep grazing in areas of historic or high potential bighorn sheep habitat?
- How will bat species and land use conflicts be managed?
- Should some or all streams capable or historically capable of supporting a fishery be managed primarily for that purpose?
- How should riparian and wetland areas be managed to maintain or enhance resource and habitat values in systems containing native fishes and/or introduced sport fishes and other aquatic species?
- How will the BLM implement the State of Nevada Wildlife Action Plan?
- Which existing planning decisions for fish, wildlife and plants should be carried forward into the new RMP?
- What measureable goals and objectives for priority wildlife, fish and rare plant species should be developed for the planning area?
- How will the new RMP establish consistent treatment of migratory birds with national and regional goals and objectives?

Issue No. 8: Wild Horses and Burros

- Should Herd Management Area boundaries be adjusted, combined, returned to Herd Area status and no longer managed for wild horse and burro maintenance?
- Which Herd Management Areas are suitable for the long-term management of wild horses and burros?
- What criteria should be used to make habitat and population suitability and viability determinations?
- What methods, other than removal through gathers, should be considered to achieve and maintain Appropriate Management Levels?
- Where are habitat improvement projects appropriate? What kinds of improvement projects are feasible? When is it appropriate to develop or augment water for wild horses and burros within Herd Management Areas?
- How should BLM address wild horse and burro urban interface issues?

Issue No. 9: Fire Management

- What is the Appropriate Management Response for all public lands and adjacent areas of the CCD with respect to resource protection and protection of life and property?
- Which areas of the CCD should be identified for managing naturally caused fire to meet resource objectives?
- What damages to or impacts on resources may result from fire suppression activities?

Issue No. 10: Livestock Grazing

- How will the BLM determine which areas are and are not available for livestock grazing?
- For areas that are deemed available to livestock grazing, which livestock grazing management practices will be used to maintain and make progress towards achieving rangeland health standards?
- How will vacant allotments be managed?
- What criteria will be used to determine if livestock grazing is appropriate for newly acquired lands?
- What management objectives should the BLM use to determine if forage for livestock is annually or seasonally available for non-renewable use permitting?

- What criteria should the BLM use to determine if a request for temporary change to the terms and conditions of a preference-based permit has merit?
- What considerations should the BLM take into account when evaluating a proposal to change the kind of livestock authorized to graze an allotment from cattle to sheep or vice versa?
- What criteria should the BLM use to determine appropriate triggers and end-point indicators for incorporation into the terms and conditions of grazing permits?
- How will BLM manage livestock grazing if invasive plant species or noxious weeds are present?
- How will BLM address grazing management needs that involve lands administered by more than one field office?
- What management criteria should the BLM develop to resolve use conflicts (e.g. urban interface)?

Issue No. 11: Recreation and Visitor Services

- Which Recreation Opportunity Spectrum classes should be identified for the District?
- Which areas will be identified as Special Recreation Management Areas (SRMAs)? Are there areas that should be specified for more intensive management?
- What are the recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained (activities, experiences and benefits)?
- What are the recreation setting character conditions required to produce recreation opportunities?
- What are the recreation objectives for the Extensive Recreation Management Areas (ERMAs)?
- Should new recreation facilities be developed?
- Should areas be designated for specific recreation use (e.g. paragliding, recreational shooting areas and windsailing) and what criteria would be employed?
- How can historic linear features (trails, historically significant roads, railroad grades, etc.) be developed and maintained for recreational use while retaining the historical value of the features?
- What is the impact of recreational use in urban interface areas?
- What level of public awareness and education should be promoted for recreational opportunities?

- How should the BLM address threshold levels and locations for recreation activities?

Issue No. 12: Lands and Realty

- Which existing withdrawals should be continued, modified, or revoked? How would lands be managed if an existing withdraw terminates?
- Which lands should be withdrawn from operation of the public land laws (e.g. saleable, locatable and leasable minerals)?
- Should the existing utility and ROW corridors be revised to provide for anticipated future needs? If so, what changes are needed?
- Which areas, if any, should be identified for potential new communication site locations, renewable energy projects or other uses?
- What criteria will the BLM use to identify ROW avoidance and/or exclusion areas?
- Are there areas that should be designated for ROW avoidance and/or exclusion areas?
- What criteria will the BLM use to identify lands or interest in lands for acquisition?
- Which public lands should be identified for disposal? What criteria will be used to determine lands suitable for disposal?
- Should the BLM identify lands available for specific types of disposal (e.g. Recreation and Public Purposes, etc.)?
- How will the BLM address the issue of "trespass town sites"?

Issue No. 13: Mineral Resources (includes Oil, Gas, Geothermal, Coal, Saleable, Solid Leasable (except coal) and Locatable)

- Where should protective constraints be included as a condition of land use authorizations? Possible constraints include, but are not limited to:
  - No Surface Occupancy (NSO) (To protect existing rights or fragile resources)
  - Controlled Surface Use (to protect areas with erosive and fragile soils, watershed areas, special status species habitat, visually sensitive areas, nominated ACECs, etc.)
  - Timing Limitation (to protect OHV areas, sage-grouse leks, deer winter ranges, etc.)
  - Controlled Surface Use & Timing Limitation (to protect wildlife habitat, grazing allotments, Herd Management Areas, etc.)

- Should any areas be closed to oil, gas and geothermal leasing?
- How will the BLM manage energy and mineral resources consistent with other public land uses?
- How will the BLM identify hazards to the public associated with inactive or abandoned mines or mining related activities?
- Should the BLM identify areas for mineral material disposal?
- What areas should be open to oil & gas and geothermal leasing?

Issue No. 14: Hazardous Materials

- How will the BLM manage the use of hazardous materials?
- How will the BLM manage public lands within the Carson River Mercury Comprehensive Environmental Response, Compensation, and Liability Act site under the multiple-use mandate?

Issue No. 15: Special Designations

- What areas warrant special designation? Possible special designations include, but are not limited to:
  - ACECs
  - Wild Horse Ranges
  - Back Country Byways
  - National Historic Landmarks
  - National Historic Trails
  - Natural Areas
  - Wilderness Area(s)
  - Wild and Scenic Rivers
  - National Landscape Conservation System Units
  - Properties of Cultural and Religious Importance/Traditional Cultural Properties
- Which citizen-proposed areas contain wilderness characteristics?
- How will existing special designations be managed and monitored?
- Are there existing special designation areas that need to be modified or removed?

Issue No. 16: Renewable Energy

- How can BLM accommodate development of renewable energy resources such as biomass, solar power, wind energy, and geothermal energy?

- What suitability criteria may be used for geothermal, biomass, solar and wind generation locations?

Issue No. 17: Socio-Economics

- What can the BLM and collaborators do to enhance positive impacts that special land designations or recreational use and development might have on local communities?
- What are the economic effects from maintaining public lands on a sustainable level?
- What are the existing social and economic conditions of the communities and local or regional governments affected by this plan and how will they be affected by the RMP?

Issue No. 18: Environmental Justice

- How can the BLM use Environmental Justice analysis to assist in the development and consideration of planning alternatives?
- How will the BLM promote and provide opportunities for full involvement of minority populations, low-income communities and tribes in BLM decisions that affect their lives, livelihoods, and health?

Issue No. 19: Sustainable Development

- How can the BLM ensure coordination, consultation, and cooperation processes are in place and working effectively with partnerships and stakeholders?
- Are the RMP decisions economically viable and is the community and regional economy adequately considered?
- Is the viability of traditional and non-market activities in the community and surrounding area maintained or improved with the RMP decisions?

Issue No. 20: Comprehensive Travel and Transportation Management

- How will the RMP address travel and transportation management? Will it specify travel management areas, guidelines, and numbering systems, or will it provide a complete road and trail inventory including roads and trail numbering and marking?
- Where does the BLM need access across private lands?
- What guidelines may be developed for a District Transportation Plan?
- How many miles of road are maintained, and how are maintenance priorities determined?
- How will road re-alignment and new construction be identified?

- What agreements are in place with counties and other government agencies for road maintenance? Do they need re-negotiation to address new concerns?
- How will the BLM identify areas as open/closed/limited to motorized vehicles?
- Are existing travel restrictions still valid? Are there new areas in need of travel restrictions?
- How should OHVs be managed? What criteria would be used to designate OHV use areas (routes) and the uses permitted on each?
- How will public access be provided and maintained for uses such as bike trails, horseback riding trails, hiking trails, all-terrain vehicle and mountain bicycle use? What criteria would be used to designate these trails and the uses permitted on each?
- Which roads in the CCD are needed to provide adequate access? How will these roads, additional needed access, and the trails system be incorporated into the Transportation Plan?
- How will appropriate access points to public lands be identified within urban interface?

Issue No. 21: Cave and Karst Resources

- Does the CCD have any cave resources and karst resources?

Issue No. 22: Urban Growth

- How will the BLM address urban growth issues?
- How will urban interface issues be identified?
- How will the BLM address local government concerns with urban growth issues?

Issue No. 23: Forest/Woodland Management

- What are the characteristics (desired future conditions and historic range of variability) of a healthy forest/woodland within the planning units?
- What management tools and practices should be used to maintain healthy forest and woodlands (e.g., pinyon, juniper, aspen, mountain, mahogany) conditions?
- How does the BLM manage for the values of forest and woodlands within the context of an overall ecological framework?
- How would the BLM address commercial, non-commercial and tribal utilization of forest and woodland resources?

3.3 SUMMARY OF PUBLIC COMMENTS BY RESOURCE PLANNING ISSUE CATEGORY

Each comment received during public scoping was reviewed and coded. Of the 1,692 comments received, 1,212 comments (71.6percent) were related to one of the planning issues defined above. In addition, 443 comments (26 percent) were related to issues that will be addressed in the RMP but do not fall within a specific planning issue category. See **Table 2-5**, Comments by Planning Issue, for a breakdown of the number of comments received for each planning issue and subcategory. Summaries of the scoping comments received for each planning issue category, as well as general RMP comments, are provided in **Sections 3.3.1**, Issue 1, through **3.3.7**, Other Issues to Be Addressed in the RMP, below. These summaries provide details only on comments related to issues that will be resolved in the RMP. Tables with all comments for each planning issue, as well as tables for issues that will not be addressed in the RMP, are included in **Appendix C**, Comments by Resource Planning Issue, and outlined in **Tables C-1** through **C-27**. Adjustments or additions may be made to the planning issues as the planning process proceeds and the BLM continues to review information, meet with the interdisciplinary team, and talk with the public.

3.3.1 Issue 1: Restoring Ecological Health

The BLM received 61 comments about restoring ecological health, representing 5 percent of the comments received on planning issues.

Comments in this category addressed general concerns for ecological health as well as sagebrush steppe, weeds, wetland and riparian vegetation and other comments related to vegetation and biological resources. Commenters were particularly concerned with protecting habitat, and providing for both active and passive restoration of disturbed areas. Comments also called for reduction of livestock grazing and removal of associated facilities including fences. Restoration projects for pinyon-juniper woodlands were also discussed as well as recreational use and impacts related to the spreading or introduction of weeds.

3.3.2 Issue 2: Air and Atmospheric Values

The BLM received 1 comment about air and atmospheric resources issues, representing 0.1 percent of planning issue comments. The comment submitted was related to air quality as a planning issue. Commenter stated that that air and atmospheric values needs further clarification as a planning issue.

3.3.3 Issue 3: Water Resources

The BLM received 35 comments about water resource issues, representing approximately 2.9 percent of the total planning issue comments. Comments primarily related to concerns about effects from livestock grazing to riparian areas and water resources and use conflicts for livestock, wild horses and energy, specifically geothermal developments. Comments stated concerns about

water allocations being adequate to meet the needs for wildlife and wild horses and water usage by geothermal and mineral developments.

3.3.4 Issue 4: Cultural Resources, Native American Concerns and Paleontology Resources

The BLM received 17 comments about cultural resources, Native American concerns, and paleontology resources in the planning area, representing 1.4 percent of the total planning issue comments.

The majority of comments concerned protection of cultural and heritage resources and tribal interests and Native American religious concerns. Several comments were concerned with the protection of cultural and historic resources in the Virginia City area. Commenters also stated the need for more cooperative efforts to manage for tribal interests and cultural resources. It was noted that protection of cultural resources in areas such as Mount Grant could also provide additional protection for sage-grouse habitat. Access to traditional tribal use areas and impacts on the viewsheds of culturally significant locations were also discussed. Specific areas that were identified as areas of concern included Sand Mountain/Grimes Point, Stillwater Mountains, Clan Alpine Mountains and the Desatoya Mountains.

3.3.5 Issue 5: Visual Resource Management

The BLM received 5 comments about visual resources in the planning area, representing 0.4 percent of the total planning issue comments. Commenters were particularly concerned with mitigation measure to be applied at the implementation level, and consideration of the sensitivity and importance of the viewshed and setting of culturally-significant locations such as historic trails.

3.3.6 Issue 6: Special Status Species

The BLM received 57 comments about special status species in the planning area, representing 4.7 percent of the total planning issue comments. Commenters were particularly concerned with sage-grouse and general management of other special status wildlife. Commenters requested that travel management be developed to avoid or minimize destruction of wildlife habitats and that important habitat areas be considered for ACEC designation. Commenters also requested that mineral and geothermal activities not be allowed or be restricted in core sage-grouse habitat. Specific concerns were addressed regarding wind developments in the Flower Range, the Pine Nut Range, and the Virginia Range and minimizing impacts on eagles. Commenters were also concerned with the areas identified as Nevada Highest Priority Conservation Sites by the Nevada Natural Heritage program and requested that the RMP outline circumstances that necessitate Endangered Species Act consultation.

3.3.7 Issue 7: Fish and Wildlife

The BLM received 23 comments about fish and wildlife in the planning area, representing 1.9 percent of the total planning issue comments. Commenters

were particularly concerned with birds, though the majority of comments were more general in nature. Aquatic and terrestrial species each received one comment. The comments about birds were concerned primarily with management of important bird areas. Aquatic wildlife comments were concerned with allowing for introduction, re-introduction, and augmentation of native and nonnative fish species. General wildlife concerns included biodiversity, management and use conflicts with livestock grazing, wild horses, recreation, and energy developments.

3.3.8 Issue 8: Wild Horses and Burros

The BLM received 295 comments about wild horses and burros in the planning area, representing 24.3 percent of the total planning issue comments. Commenters were particularly concerned with herd management, herd management areas, and management and use conflicts with regards to livestock grazing, wildlife, recreation and all types of development. Forage allocations, water allocations, use of fertility controls, herd health, viability and feasibility of varying management strategies were also discussed. Appropriate Management Levels in the Augusts Herd Management Area was specifically addressed as a concern.

3.3.9 Issue 9: Fire Management

The BLM received 11 comments about fire management in the planning area, representing 0.9 percent of the total planning issue comments. Commenters were particularly concerned with restoration efforts, seeding with native vegetation, livestock grazing restrictions in burned or reseeded areas, loss of important habitat or sensitive species. Also discussed were the use of livestock grazing to control forage and management of forest products using methods such as thinning, which would also benefit fire management.

3.3.10 Issue 10: Livestock Grazing

The BLM received 94 comments about livestock grazing in the planning area, representing 7.8 percent of the total planning issue comments. Commenters were particularly concerned with the economic contributions of livestock grazing, conflicts with wild horses and wildlife, and rangeland impacts, including the spread or introduction of weeds. Many of the livestock grazing comments were concerned with the impacts of grazing on the wild horse herd areas and the competition for water resources.

3.3.11 Issue 11: Recreation and Visitor Resources

The BLM received 248 comments about recreation in the planning area, representing 20.5 percent of the total planning issue comments. Commenters were particularly concerned with OHV use and other recreational use of trails within the planning area. Some commenters were concerned with restrictions to OHV use and closure of trails, while other commenters were concerned with the impacts from OHV use to resources and conflicts with other uses including wild horses, wildlife and other forms of recreation. Recreational use

within the urban interface, non-motorized and non-mechanized uses of the trails and protection of cultural resources were also discussed. Requests were made for the designation of mountain bike trails as well as trails for hiking and equestrian use.

Specific OHV and mountain bike use areas that were identified included the Sand Mountain recreation area, the Canoe Hill Trail System, the Sun Valley Rim Trail, Hungry Valley, Middlegate, Eastgate, Wilson Canyon, and the Pine Nut Range. Several comments discussed the need for designated trail systems. Another concern that was raised was the regarding designated shooting areas while others requested that shooting and hunting be allowed in all areas. The Pine Nut Mountains and Moonrocks were identified as potential Special Recreation Areas.

3.3.12 Issue 12: Lands and Realty

The BLM received 36 comments about lands and realty in the planning area, representing 3.0 percent of the total planning issue comments. Commenters were particularly concerned with the Virginia City National Historic Landmark, Canoe Hill Trail System was identified in the comments for recreation and public purposes lands. Commenters also requested consideration of the dump site in Lyon County for disposal to be used as a shooting range. The acquisition of access rights through private and Bureau of Indian Affairs lands was also discussed. Concerns were also expressed regarding disposal of lands with priority sage-grouse habitat and that rights-of-way no longer in use be rehabilitated. A number of comments were concerned with energy and infrastructure developments and impacts on wildlife and important. Other comments outlined possible mitigation for development and criteria for identifying lands for disposal and retaining lands with sensitive resources or key habitat.

3.3.13 Issue 13: Mineral Resources (includes Oil, Gas, Geothermal, Coal, Saleable, and Solid Leasable except coal), and Locatable

The BLM received 40 comments about mineral resources in the planning area, representing 3.3 percent of the total planning issue comments. Commenters were particularly concerned with minerals and mining (25 comments), energy development (6 comments regarding geothermal, 8 comments on general energy development) and development of oil and gas (1 comment). The concerns were related to access for and continued approval of minerals and energy development; commenters were both for and against continued access and development. Other concerns included water allocations for mineral and energy developments, and conflicts with other uses and resources impacts.

3.3.14 Issue 14: Hazardous Materials

The BLM received 3 comments about hazardous materials in the planning area, representing 0.2 percent of the total planning issue comments. Commenters were particularly concerned with the Carson River Mercury Superfund Site and

the use of 2,4-D near the urban interface and impacts on wild horses, wildlife, and water resources.

3.3.15 Issue 15: Special Designations

The BLM received 46 comments about special designations in the planning area, representing 3.8 percent of the total planning issue comments. Commenters were particularly concerned with protection of wilderness characteristics specifically in wilderness study areas and assessment of lands with wilderness characteristics to include an inventory of the planning area. The Carson and Walker Rivers were identified for consideration as wild and scenic rivers.

Comments were submitted nominating specific locations for consideration as ACECs, including important bird areas, core or priority sage-grouse habitat (for greater and bi-state populations) and Nevada Highest Priority Conservation Sites. Commenters also requested that all existing ACECs be retained.

3.3.16 Issue 16: Renewable Resources

The BLM received 11 comments about renewable resources in the planning area, representing 0.9 percent of the total planning issue comments. Commenters were particularly concerned with impacts of renewable energy development on OHV use and wildlife and special status species. Comments were also concerned with wind energy impacts on eagles and identified specific areas where wind energy should not be allowed, including the Flower Range, the Pine Nut Range, and the Virginia Range.

3.3.17 Issue 17: Socio-Economics

The BLM received 36 comments about socio-economics in the planning area, representing 3.0 percent of the total planning issue comments. Commenters were particularly concerned with the continued economic development and uses of public lands that contribute to local economies and tourism. Commenters were also concerned with economic viability and social opinion regarding wild horse management and impacts on wild horses from economic development including livestock grazing and minerals.

3.3.18 Issue 18: Environmental Justice

No comments were received about environmental justice.

3.3.19 Issue 19: Sustainable Development

No comments were received about sustainable development.

3.3.20 Issue 20: Comprehensive Travel and Transportation Management

The BLM received 157 comments about travel management in the planning area, representing 13 percent of the total planning issue comments. Commenters were particularly concerned with any areas being closed to OHV use. Specific use areas and trail systems were identified and are discussed under Issue 11: Recreation (Section 3.3.11).

3.3.21 Issue 21: Cave and Karst Resources

No comments were received about cave and karst resources.

3.3.22 Issue 22: Urban Growth

The BLM received 7 comments about urban interface in the planning area, representing 0.6 percent of the total planning issue comments. Commenters were particularly concerned with urban interface issues including user conflicts (e.g., shooting, hiking, mountain biking, horseback riding, and OHV use) and public safety, illegal dumping, wildlife, and wild horses. Requests were made to consider a buffer area or recreation corridors to address user conflicts.

3.3.23 Issue 23: Forest and Woodland Management

The BLM received 5 comments about forestry in the planning area, representing 0.4 percent of the total planning issue comments. Commenters were particularly concerned with comprehensive woodland management that considers Native American uses but also addresses pinyon-juniper encroachment and sustainable wildlife habitat. Commenters were also concerned with sagebrush treatment or removal.

3.3.24 Issue 24: Geology and Soils

The BLM received 9 comments about geology and soils in the planning area, representing 0.7 percent of the total planning issue comments. Commenters were particularly concerned with disturbance to soils and microbiotic soils from livestock grazing and soils erosion from horse trailing.

3.3.25 Issue 25: Drought Management/Climate Change

The BLM received 5 comments about climate change and drought management in the planning area, representing 0.4 percent of the total planning issue comments. Commenters were particularly concerned with effects of climate change on BLM-administered lands, resources, and programs.

3.3.26 Issue 26: Public Health and Safety

The BLM received 8 comments were received about public health and safety in the planning area, representing 0.7 percent of the total planning issue comments. Commenters were particularly concerned with user conflicts that pose public safety hazards associated with shooting and other uses such as hiking, mountain biking, or horseback riding and safety issues with mechanized and non-mechanized recreational users on the same trails. Other concerns were related to the Carson River Mercury Superfund Site and hazards associated with historic mining in the planning area and wild horse-vehicle collisions.

3.3.27 Issue 27: Other Resource Concerns

The BLM received 2 comments about other resource concerns in the planning area, representing 0.2 percent of the total planning issue comments. Commenters were particularly concerned with illegal dumping on public lands in the planning area and educational and research opportunities for public lands.

3.3.28 Other Issues to Be Addressed in the RMP

Of the 1,692 comments received, 71.6 percent (1,212 comments) were related to planning issues that will be addressed in the RMP. Another 443 comments (26 percent) focused on other topics, such as the planning process in general, alternatives, or the public involvement process. These topics will be addressed in the RMP but do not fit within any particular planning issue category. Comments are displayed in **Appendix C**, Comments by Resource Planning Issue, **Table C-4**, General Comments Related to the RMP.

3.4 ISSUES THAT WILL NOT BE ADDRESSED IN THE RMP

Approximately 2.2 percent or 37 comments related to issues that will not be addressed in the RMP. These include issues resolved through policy or administrative action, implementation issues that have already been addressed or will be addressed by the CCD independent of the RMP, and issues beyond the scope of the RMP that have been considered but will not be included. These comments are represented in **Appendix C**, Comments by Resource Planning Issue, **Table C-1**, General Comments Outside the Scope of the RMP, **Table C-2**, Comments Related to Issues to Be Solved by National Policy, and **Table C-3**, Comments Related to Implementation Actions.

Administrative or policy issue comments included issues pertaining to national BLM policy that will not be addressed during the Carson City RMP process. Comments include the BLM standards used to classify recreational areas, as well as policies for management of lands with wilderness characteristics.

Implementation issues that have been or will be addressed by the CCD outside of the RMP process include decisions that require on-the-ground action following the RMP decisions.

Issues outside the scope of the RMP include comments about land management on areas outside the planning area. This category also included comments on issues in which the BLM has limited or no administrative authority.

3.5 ANTICIPATED DECISIONS

The FLPMA requires the BLM to manage public lands using the principles of multiple use and sustained yield. Management direction resulting from the planning process for the RMP needs to be adaptable to changing conditions and demands over the life of the RMP. The RMP will provide management direction and guide decision making for determining appropriate multiple uses and allocation of resources. It will also include strategies to manage and protect resources and systems to monitor and evaluate the status of resources and the effectiveness of management practices. The BLM is reviewing the condition of the environment and the current management situation to identify which management directions should be continued, which should be modified, and which should be developed and added.

This scoping report does not make any decisions, nor does it change current management direction set forth in the 2001 Consolidated RMP. Instead it summarizes those issues identified during the scoping period. The BLM will use planning issues summarized in this scoping report, along with subsequently identified issues, planning criteria, and other information, to help formulate a reasonable range of alternatives during the next phase of the RMP process. Each identified alternative, including continuation of existing management practices, will represent a complete and reasonable plan for managing the CCD. Future decisions will occur at two levels: the RMP level, and the implementation level. These decision types are described below. In general, only land-use-plan-level decisions will be made as part of the RMP process. The BLM's evaluation of identified alternatives will be documented in an EIS prepared as part of the RMP process, as required under NEPA.

3.5.1 Future Land Use Plan-level Decisions

Future RMP-level decisions will be made on a broad scale. These decisions will identify management direction and guide actions for the coming decades within the planning area. The RMP will provide a comprehensive yet flexible framework for managing the numerous demands on resources located on public lands.

The vision for the CCD will be described in the RMP in terms of two categories of RMP-level decisions: 1) desired outcomes; and 2) allowable uses and actions to achieve desired outcomes. Desired outcomes will be expressed in terms of specific goals, standards, and objectives. Goals are broad statements of desired outcomes, such as ensuring sustainable development. Standards are descriptions of conditions or the degree of function required, such as land health standards. Objectives are specific, quantifiable, and measurable desired conditions for resources (e.g., managing sagebrush communities to achieve a certain canopy cover by 2020).

Allowable uses and actions to achieve desired outcomes will be expressed in the RMP as allowable uses, actions needed, and land tenure decisions. Livestock grazing, administrative designations (for example, ACECs), and identification of lands suitable for disposal are examples of some RMP-level decisions in this category.

3.5.2 Future Implementation-level Decisions

The RMP will contain broad-scale decisions that guide future land management actions. Subsequent site-specific implementation, often characterized as project-level or activity-level decisions, will require the BLM's final approval of on-the-ground actions. Implementation decisions require a more-detailed, site-specific environmental analysis that tiers off of the EIS prepared for the RMP. These decisions generally constitute final approval of on-the-ground actions to proceed (BLM Land Use Planning Handbook H-1601-1, Section IV[B] [BLM 2005]). An example of an implementation decision is the development and management of a

recreation site. They may be incorporated into implementation plans (activity or project plans) or may exist as stand-alone decisions.

These types of decisions require site-specific planning and NEPA analysis. Where implementation decisions are made as part of the land use planning process, they are still subject to the appeals process or other administrative review as prescribed by specific resource program regulations after the BLM resolves the protests to land use plan decisions and makes a decision to adopt or amend the RMP (High Desert Multiple Use Coalition, Inc. et al. Keith Collins, 142 IBLA 285 [1998]).

3.6 VALID EXISTING MANAGEMENT

The BLM-administered public lands in the planning area are managed with direction from the 2001 Consolidated RMP and subsequent amendments. Preparation of an RMP is necessary to respond to changing resource conditions and to respond to new issues and federal policies. The RMP will establish new land use planning decisions to address issues identified through public scoping and, where appropriate, may incorporate decisions from the 2001 Consolidated RMP, as amended. Determining which existing management decisions to carry forward is part of the planning process. The BLM will review the existing management situation to determine which decisions to carry forward and will identify where new management guidance should be developed. This review was documented in the Analysis of the Management Situation.

3.7 SPECIAL DESIGNATIONS, INCLUDING NOMINATIONS

The RMP will include a discussion of special designation areas including ACECs, Wilderness Study Areas, and national trails and byways.

In addition, the RMP will address new special management areas designations. As part of the RMP effort, the CCD will determine eligibility and potential classification and suitability of stream segments for inclusion in the National Wild and Scenic Rivers System.

New ACEC designations and management of lands with wilderness characteristics will also be considered in the development of the RMP. An ACEC report is currently being prepared by the CCD and will document the relevance and importance criteria findings of nominated ACECs. Its findings will be incorporated into the RMP alternatives. An assessment of lands with wilderness characteristics outside Wilderness Study Areas is scheduled for completion in Spring 2013. The report will document the public lands within the planning area outside of Wilderness Study Areas that contain wilderness characteristics. Its findings will be incorporated into the RMP alternatives.

SECTION 4
PLANNING CRITERIA

During its initial planning sessions, the CCD staff developed preliminary planning criteria. Planning criteria establish constraints, guidelines, and standards for the planning process. They help planners define the scope of the process and estimate the extent of data collection and analysis. Planning criteria are based on standards prescribed by applicable laws and regulations; agency guidance; results of consultation and coordination with the public, other federal, state, and local agencies, and Indian tribes; analysis of information pertinent to the planning area; and professional judgment. The plan will be completed in compliance with the FLPMA, NEPA, and all other applicable laws, regulations, and policies. Impacts from the management alternatives considered in the revised RMP will be analyzed in an EIS developed in accordance with regulations at 43 CFR 1610 and 40 CFR 1500.

The following preliminary criteria were developed internally for the CCD and presented for public comment. After public input is analyzed, the criteria become proposed criteria and can be added to or changed as the issues are addressed or as new information is presented. The CCD managers will approve the issues and criteria, along with any changes. Additional suggested criteria received in public scoping comments are provided in **Section 4.2**, Additional Suggestions for Planning Criteria.

4.1 PRELIMINARY PLANNING CRITERIA

- The proposed RMP will comply with the FLPMA and all other applicable laws, regulations, and policies.
- Impacts from the management alternatives considered in the RMP will be analyzed in an EIS developed in accordance with regulations at 43 CFR 1610 and 40 CFR 1500.

- The BLM will use a collaborative public process and multi-jurisdictional approach, where possible, to jointly determine the desired future condition of public land.
- Other federal, state, and local agencies, including military departments, with jurisdiction by law or special expertise will be invited to participate in the planning process.
- Lifestyles, concern, safety, and health of area residents will be recognized in the RMP.
- The RMP will recognize the state's responsibility to manage wildlife.
- The RMP will recognize the state's authority to regulate air quality and adjudicate water rights.
- The RMP will recognize the existence of valid existing rights. Lands covered in the RMP will be public land, including split estate, managed by the BLM. Management decisions on lands not managed by the BLM will not be made in the RMP. In addition to public land, the BLM administers fluid mineral interests on other federal lands, including lands managed by the US Forest Service, US Bureau of Reclamation, and Department of Defense military withdrawn lands and manages federal mineral estate beneath private or state surface estates.
- The BLM will strive to ensure that decisions in the RMP are as consistent as possible with plans and policies of adjacent local, state, tribal, and federal agencies, within the parameters set by federal law, regulations, and policy.
- The RMP/EIS will incorporate management decisions that are brought forward from the existing RMP and amendments.
- Native American tribes will be consulted during the development of the RMP and to develop strategies for the protection of recognized Native American traditional and cultural uses.
- The BLM, collaborative partners, and the contractor will jointly develop alternatives for resolution of resource management issues.
- The planning process will incorporate by reference the appropriate standards and guidelines (developed by the RACs) as approved by the State Director.
- The State Historic Preservation Officers in Nevada and California will be consulted and involved throughout the planning/EIS process under provisions in the National Programmatic Agreement and the State [of Nevada and California] Protocol Agreements between the BLM and State Historic Preservation Officers.
- Endangered species recovery plan goals, including plans for the reintroduction of endangered species and other species, will be addressed. In accordance with the Memorandum of Agreement on the Endangered Species Act (ESA) Section 7 Consultations and Coordination, dated August

30, 2004, the BLM and USFWS will jointly prepare a programmatic consultation agreement.

- Areas potentially suitable for ACEC or other special management designations will be identified and analyzed in the RMP/EIS.
- The mineral development scenario will be based on mineral potential within the District, projected demand from the mineral industries, and the National Energy Plan. The planning process will address areas closed to mining, constraints to surface use, and post-mining land use.
- BLM Handbook H-1624-1 Planning for Fluid Minerals will be followed in the development of fluid minerals determinations. Leasing stipulations requirements for exceptions, modifications and waivers will follow Washington Office Instruction Memorandum 2008-032.
- Baseline Reasonably Foreseeable Management/Development scenarios will be developed based on historical, existing, and projected levels for all programs.
- Lands identified for disposal prior to July 25, 2000, will be identified for disposal under the Federal Land Transaction Facilitation Act.
- The RMP will address transportation and access per guidance outlined in Washington Office Instruction Memorandum 2008-014.
- Soil/vegetation correlations from Natural Resource Conservation Service Soil Surveys will be used to determine ecological site potentials. Ecological Site Inventory will be used to establish and document current vegetation conditions.
- The Natural Resource Conservation Service Major Land Resource Areas will be used to describe ecological or range site vegetative potential.
- Fire and fuels management strategies will be consistent with the 2009 Federal Wildland Fire Policy, and other handbooks, manuals and instruction memoranda in effect.
- The RMP/EIS will be consistent with Homeland Security policies to the extent practicable.
- For NEPA analysis purposes, the short-term will be 5 years, and the long-term will be 50 years. The RMP will be evaluated every 5 year to determine if amendments or revisions are necessary.
- All data used in the RMP/EIS will be in electronic format or converted to electronic format. All graphic material will be in Geographic Information System format.
- Geographic Information System and metadata information will meet Federal Geographic Data Committee standards, as required by Executive Order 12906, signed April 11, 1994.

- Other applicable BLM data standards will be followed. The goal is to develop a plan with spatial data that can be easily accessed for use in subsequent NEPA analyses.
- The requirements to address sage-grouse, habitat and conservation as outlined in the National Sage-Grouse Habitat Conservation Strategy and Washington Office Instruction Memorandum 2005-024, or most current guidance will be followed.
- The BLM will consider airspace use as well as military use of public lands in developing allocations and management guidance in the RMP.
- The RMP will consider the guidance for rights of way and corridors contained in Washington Office Instruction Memorandum 2002-196 or the most current guidance available. The RMP will also consider setting resource management objectives (e.g., vegetation and wildlife) within designated corridors.
- The RMP will provide for management of renewable energy resources and oil and gas in accordance with current guidance.
- Best management practices for all BLM management activities will be incorporated into the RMP.

4.2 ADDITIONAL SUGGESTIONS FOR PLANNING CRITERIA

Four public comments were identified as additional suggestions for planning criteria and are included below.

1. In accordance with the FLPMA, the BLM must also "prepare and maintain on a continuing basis an inventory of all public lands and their resources and values," giving priority to areas of critical environmental concern (43 USC § 1711[a]; see also State of Utah v. Babbitt, 137 F.3d 1193 [10th Cir. 1998]). "This inventory shall be kept current so as to reflect changes in condition and to identify new and emerging resource and other values" (43 USC § 1711[a]). This includes data on current population numbers or trends for many of the sensitive, rare, threatened and endangered species in the district.

2. "The National Environmental Policy Act ("NEPA") requires that each agency disclose relevant environmental information to the public and demonstrate that the agency took a "hard look" at the consequences of the proposed decision, and alternatives that might be pursued with less environmental harm, before making its decision. See, e.g., Kern v. U.S. Bureau of Land Mgmt., 284 F.3d 1062, 1066 (9th Cir. 2002). To that end, agencies must first describe the environment of the area that will be affected by the proposed decision (40 CFR § 1502.15). In addition, agencies must "study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources" (42 USC § 4332[2]€). This requirement applies

whether the agency undertakes an environmental assessment ("EA") or an environmental impact statement ("EIS") (42 USC § 4332[2]€; see 40 CFR §§ 1501.2[c], 1508.9[b])."

3. In addition to FLPMA, Sec. 202, particularly subsection (c)(1) that specifically requires development and revision of land use plans on the basis of "principles of multiple-use and sustained yield," FLPMA Section 102(a) (7) also specifically requires that "goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple-use and sustained yield unless otherwise specified by law."

4. 43 CFR 1601.0-8 provides, "The development, approval, maintenance, amendment and revision of resource management plans will provide for public involvement and shall be consistent with section 202 of the Federal Land Policy and Management Act of 1976." 43 CFR 1610.4-4 states, "The analysis of the management situation shall provide, consistent with multiple-use principles, the basis for formulating reasonable alternatives, including the types of resources for development or protection." 43 CFR 1610.4-5 states, "All reasonable resource management alternatives shall be considered and several complete alternatives developed for detailed study."

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SECTION 5
DATA SUMMARY/DATA GAPS

As part of the RMP planning, evaluation, and data-collection process, the BLM has inventoried available information and has identified data needs for socioeconomics, mineral extraction and energy development, air quality modeling, Class I cultural data, ethnographic information, wild and scenic rivers, and ACECs. A summary is as follows:

An assessment of various social and economic parameters will be conducted with local governments; the results will be documented in a socioeconomic report and incorporated into the RMP/EIS.

A mineral potential report will be developed in cooperation with the BLM and cooperating state and federal agencies. The report will assess the mineral resource occurrence and development potential of the area defined for the RMP.

A wild and scenic rivers eligibility and suitability study will be conducted; the results will be documented in a report and incorporated into alternatives and analyzed in the RMP/EIS.

Air quality characterization and impact analysis will be conducted and will form the baseline of the impact analysis in the EIS.

A Class I cultural resources survey is underway. Issues and management considerations provided in this survey will be included in the RMP.

An ethnohistory study will be undertaken, and with the addition of tribal consultation. The results of this study will be used in formation of management alternatives in the RMP.

Officially nominated areas would be assessed for designation as ACECs, and the results would inform the Special Designations section of the RMP/EIS.

Both new data and existing resource information will be used in formulating resource objectives and management alternatives in the RMP. To facilitate this process, information is being compiled and put into digital format for use in analysis and map production using geographic information systems. Because this information is imperative to quantify resources, to update maps, and to manipulate information during alternative formulation, this process must be completed before actual analysis can begin. New data generated during the RMP process will be used to address planning issues and will meet applicable established standards.

Both new data and existing resource information will be used in formulating resource objectives and management alternatives in the RMP. To facilitate this process, information is being compiled and put into digital format for use in analysis and map production using Geographic Information Systems. Because this information is imperative to quantify resources, to update maps, and to manipulate information during alternative formulation, this process must be completed before actual analysis can begin. New data generated during the RMP process will be used to address planning issues and will meet applicable established standards.

SECTION 6
FUTURE STEPS

6.1 FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The next phase of the BLM's planning process is to develop draft management alternatives based on the issues presented in **Sections 3.2,** Planning Issue Statements, and **3.3,** Summary of Public Comments by Resource Planning Issue Category, of this scoping report. These alternatives will address planning issues identified during scoping and will meet the purpose and need of the project and goals and objectives to be developed by the BLM's interdisciplinary team. In compliance with NEPA, CEQ regulations, and BLM planning regulations and guidance, alternatives should be reasonable and capable of implementation. The BLM will also meet with cooperating agencies, interested tribes, the RAC, and community groups and individuals. A detailed analysis of the alternatives will be completed, and the BLM's preferred alternative will then be identified. The preferred alternative is often made up of a combination of management option components from various alternatives to provide the best mix and balance of multiple land and resource uses to resolve the issues.

The analysis of the alternatives will be documented in a Draft RMP/EIS. Although the BLM welcomes public input at any time during the planning process, the next official public comment period will begin when the Draft RMP/EIS is published, which is anticipated in spring 2014. The draft document will be widely distributed to elected officials, regulatory agencies, and members of the public; and it will be available on the project website (http://www.blm.gov/nv/st/en/fo/carson_city_field.html). The availability of the draft document will be announced via a Notice of Availability in the Federal Register, and a 90-day public comment period will follow. Public meetings will be held throughout the project area during the 90-day comment period.

At the conclusion of the public comment period, the Draft RMP/EIS will be revised. A Proposed RMP/Final EIS will then be published. The availability of the proposed document will be announced in the Federal Register, and a 30-day

public protest period will follow regarding the proposed planning level decisions (43 CFR Part 1610.5.2). If necessary, a notice will be published in the Federal Register requesting comments on significant changes made as a result of protest. Concurrently, the Governors of Nevada and California will review the document for consistency with approved state and local plans, policies, and programs.

At the conclusion of the public protest period and the Governors' consistency review, the BLM will resolve all protests and any inconsistencies, and the approved RMP and Record of Decision will be published. The availability of these documents will be announced in the Federal Register. Any implementation-level decisions in the RMP, such as travel route designations, are not subject to the protest process but instead are subject to administrative remedies set forth in regulations applicable to the specific resource management program. These remedies generally take the form of appeals to the Office of Hearings and Appeals within 30 days of the effective date of the Record of Decision or in accordance with the provisions of 43 CFR 4.4.

All publications, including this report, newsletters, the Draft RMP/EIS, and the Notice of Availability, will be published on the Carson City RMP website (http://www.blm.gov/nv/st/en/fo/carson_city_field.html). In addition, pertinent dates regarding solicitation of public comments will be published on the website.

6.2 Contact Information

The public is invited and encouraged to participate throughout the planning process for the RMP. Some ways to participate include:

- Reviewing the progress of the RMP at the CCD website: http://www.blm.gov/nv/st/en/fo/carson_city_field.html, which will be updated with information, documents, and announcements throughout the duration of the RMP preparation; and
- Requesting to be added to or to remain on the official Carson City RMP project mailing list in order to receive future mailings and information. (e-mail blm_nv_ccdo_rmp@blm.gov)

Anyone wishing to be added to or deleted from the distribution list, wishing to change their contact information, or requesting further information may email a request to blm_nv_ccdo_rmp@blm.gov or contact Ms. Colleen Sievers, RMP Project Manager, BLM, CCD, 5665 Morgan Mill Road, Carson City, Nevada 89701, phone 775-885-6000. Please provide name, mailing address, and e-mail address, as well as the preferred method to receive information.

SECTION 7
REFERENCES

BLM (US Department of the Interior, Bureau of Land Management). 1995. Handbook H-8550-1—BLM Interim Management Policy for Lands under Wilderness Review. BLM, Washington, DC.

_____. 2001. Carson City Consolidated Resource Management Plan, Carson City Field Office, Carson City, NV. May 2001.

_____. 2005. Handbook H-1601-1—Land Use Planning Handbook. BLM, Washington, DC. March 11, 2005. 161 pp.

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Appendix A

Scoping Materials

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APPENDIX A
SCOPING MATERIALS

Public scoping for the CCD RMP/EIS has included a postcard, six scoping open houses, press releases, notices in local newspapers, and a public website. Although mailing of the postcard in February 2012 initiated an informal scoping period, the formal public comment period as required by NEPA began on February 24, 2012, with the publication of a Notice of Intent in the Federal Register, and ended on April 29, 2012.

Information provided to the public during the public scoping period and a record of attendees at public meetings is included in this appendix. Material includes the following:

1. Notice of Intent
2. Project Postcard
3. Press Release
4. Newspaper Advertisements
5. Scoping Flyer
6. Scoping Comment Form

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materials available for this. The Department will post all comments.

• *Mail, overnight courier, or hand-carry comments to:* EITI Comments; c/o U.S. Department of the Interior; 1801 Pennsylvania Ave. NW., Suite 400, Washington, DC 20006.

FOR FURTHER INFORMATION CONTACT: Karen Senhadji; Senior Advisor to the Assistant Secretary for Policy, Management and Budget; 1849 C Street NW., Washington, DC 20240, telephone (202) 254–5573, fax number (202) 254–5589, email *eiti@ios.doi.gov*.

SUPPLEMENTARY INFORMATION: In September 2011, President Barack Obama announced the United States' commitment to participate in the Extractive Industries Transparency Initiative (EITI). EITI is a signature initiative of the U.S. national action plan for the international Open Government Partnership. On October 25, concurrent with the EITI board meeting in Jakarta, President Obama named Secretary of the Interior Ken Salazar as the U.S. Senior Official responsible for implementing USEITI. In response, Secretary Salazar posted a White House blog the same day, committing to work with industry and civil society to implement USEITI.

Thirty-five countries are in various stages of implementing EITI, most of them developing countries who have been encouraged to join by industry, civil society and the World Bank. EITI offers a voluntary framework for governments and companies to publicly disclose in parallel the revenues paid and received for extraction of oil, gas and minerals owned by the state. The design of each framework is country-specific, and is developed through a multi-year, consensus based process by a multi-stakeholder group comprised of government, industry and civil society.

EITI will strengthen relationships among the U.S. government, industry, and civil society; deliver a more transparent, participatory, and collaborative government; ensure the full and fair return to the American people for the use of its public resources; and enable the U.S. to lead by example internationally on transparency and good governance. For further information on EITI, please visit the Department of the Interior's EITI Web page at *http://www.doi.gov/EITI*.

Accordingly, the Department of the Interior is seeking public comment and recommendations on the following specific issues:

• The EITI requires a multi-stakeholder group to be formed to oversee implementation. Who are the key sectors or stakeholders that need to be involved in the multi-stakeholder group?

• How best can a balance, with regards to interests and perspectives, be achieved in the formation of the multi-stakeholder group?

• In your opinion, what are the key attributes of both a successful multi-stakeholder group and the successful implementation of USEITI?

• What key concerns, if any, do you have about implementing the USEITI process?

Executive Order 13175 requires the Federal Government to consult and collaborate with the Indian community (tribes and individual Indian mineral owners) in the development of Federal policies that impact the Indian community. The locations of the public listening sessions will be chosen to allow for increased participation by the Indian community.

We encourage stakeholders and members of the public to participate. The listening session will be open to the public without advance registration; however, attendance may be limited to the space available at each venue. For building security measures, each person may be required to present a picture identification to gain entry to the meetings.

Dated: February 16, 2012.

Amy Holley,

Acting Assistant Secretary, Policy, Management and Budget.

[FR Doc. 2012–4316 Filed 2–23–12; 8:45 am]

BILLING CODE 4310–T2–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLNVCO0000.L16100000.DO0000. LXSS155F0000; 12–08807; MO# 4500030996; TAS: 14X1109]

Notice of Intent To Prepare a Revision to the Carson City District Resource Management Plan and Associated Environmental Impact Statement, Nevada

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969, as amended, and the Federal Land Policy and Management Act of 1976, as amended, the Bureau of Land Management (BLM) Carson City District (CCD), Carson City, Nevada, intends to prepare a Resource Management Plan (RMP) revision with an associated Environmental Impact Statement (EIS) for the Carson City District, and by this notice is announcing the beginning of the scoping process to solicit public comments and identify issues. The BLM will also seek nominations for Areas of Critical Environmental Concern (ACEC) and information on lands that may possess wilderness characteristics. The RMP will replace the existing Carson City Field Office Consolidated RMP (2001).

DATES: This notice initiates the public scoping process for the RMP with associated EIS. Comments on issues may be submitted in writing until April 24, 2012. Public scoping meetings will be held in Reno, Carson City, Yerington, Fallon, Hawthorne, and Minden, Nevada. The meeting times and addresses will be announced through the local news media, newsletters, mailings and the BLM project Web site: *www.blm.gov/nv/st/en/fo/carsoncity_field.html* at least 15 days prior to the event. All comments must be received prior to the close of the 60-day scoping period or 30 days after the last public meeting, whichever is later. The BLM will provide additional opportunities for public participation upon publication of the Draft RMP/EIS.

ADDRESSES: You may submit comments on issues and planning criteria related to the Carson City RMP/EIS revision by using any of the following methods:

• *Web site: www.blm.gov/nv/st/en/fo/carsoncity_field.html.*

• *Email: BLM_NV_CCDO_RMP@blm.gov.*

• *Fax:* 775–885–6147 Attention: Carson City RMP.

• *Mail:* Bureau of Land Management, 5665 Morgan Mill Road, Carson City, Nevada 89701 Attention: Carson City RMP.

Documents pertinent to this proposal may be examined at the Carson City District Office during regular business hours 7:30 a.m. to 4:30 p.m., Monday through Friday except holidays.

FOR FURTHER INFORMATION CONTACT: And/or to have your name added to the mailing list, call Colleen Sievers, Project Manager, 775–885–6000, or email *csievers@blm.gov*. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: This document provides notice that the BLM Carson City District intends to prepare an RMP with an associated EIS for the Carson City District Planning Area,

announces the beginning of the scoping process, and seeks public input on issues and planning criteria. The planning area is located in portions of 12 counties within 2 States (Washoe, Storey, Carson City, Douglas, Lyon, Churchill, Mineral, and Nye counties within Nevada; and Sierra, Alpine, Plumas, and Lassen counties within California), and encompasses approximately 5 million acres of public land. The planning area includes all lands regardless of jurisdiction; however the BLM will only make decisions on lands or interest in land under the BLM's jurisdiction, including subsurface minerals. The decision area includes only public land or interest in land managed by the BLM. The purpose of the public scoping process is to determine relevant issues that may influence the scope of the environmental analysis, including alternatives, and guide the planning process. Preliminary issues for the planning area have been identified by BLM personnel, Federal, State, and local agencies, and other stakeholders. The issues include, but are not limited to: Managing vegetative and water resources, including noxious and invasive species management; identifying terrestrial and aquatic wildlife and fish priority habitats; identifying and evaluating Areas of Critical Environmental Concern; identifying lands with wilderness characteristics; determining eligibility for Wild and Scenic Rivers, National Scenic and Historic Trail management, identifying off-highway vehicle designations and travel management, and special recreation management areas to meet increasing recreation demands; managing and protecting cultural, historical, and paleontological resources, as well as Native American religious and traditional values; visual resource management; managing renewable energy development for geothermal, solar and wind; identifying land tenure adjustments to meet community growth needs and sustainable development, and to facilitate the management of public lands; managing minerals, including stipulations to protect sensitive resources. Additional management concerns identified by the BLM include: Urban mining; grazing allotments near urban areas; and access to public lands. Preliminary planning criteria include: (1) The RMP revision will comply with FLPMA and all other applicable laws, regulations, and policies; (2) The RMP revision will analyze impacts from all alternatives in accordance with regulations at 43 CFR part 1610 and 40 CFR part 1500; (3) Decisions in the RMP revision will only apply to public lands and the mineral estate managed by the BLM; (4) The RMP revision process will follow the BLM Land Use Planning Handbook H–1601–1; (5) The RMP revision planning process will include broad-based public participation; (6) The RMP revision process will consider the identification and management of lands with wilderness characteristics; and (7) The RMP revision decisions will consider and incorporate existing plans and policies to the maximum extent possible of adjacent local, State, Federal, and tribal agencies to the extent consistent with Federal law and regulations applicable to public lands; (8) The RMP revision process will rely on available inventories of the lands and resources as well as data gathered during the planning process; (9) The RMP revision process will follow requirements to address sage-grouse habitat and conservation as outlined in the National Sage-Grouse Habitat Conservation Strategy, the Greater Sage-Grouse Notice of Intent (FR 2011–36152, December 9, 2011), and the most current BLM guidance and instruction memoranda; (10) The RMP revisions process will use Geographic Information Systems and corporate geospatial data to the extent practicable and Federal Geographic Data Committee standards and other applicable BLM data standards will be followed; (11) The RMP revision EIS will be developed through the BLM's ePlanning system to the extent consistent with the current functionality of the system and schedule considerations; (12) The RMP revision will incorporate and observe the principles of multiple use and sustained yield; (13) The RMP planning process will involve consultation with Native American tribal governments; (14) The RMP revision will recognize valid existing rights and incorporate valid existing management from the existing Carson City Field Office Consolidated RMP (2001) as appropriate; (15) The RMP revision will include a review of eligibility findings and tentative classification of waterways as eligible for inclusion in the National Wild and Scenic River System and follow the criteria contained in 43 CFR part 8351.

The BLM will collaborate with tribes, State and local governments, Federal agencies, local stakeholders, and others with interest in the RMP revision process. You may submit comments on issues and planning criteria to the BLM using one of the methods listed in the **ADDRESSES** section above. Before including an address, phone number, email address, or other personal identifying information in your comment, you should be aware that the entire comment—including personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. The minutes and list of attendees for each scoping meeting will be available to the public and open for 30 days after the meeting to any participant who wishes to clarify the views he or she expressed. The BLM will evaluate the identified issues to be addressed in the RMP and will place them into one of three categories:

1. Issues to be resolved by the RMP;

2. Issues to be resolved through policy or administrative action; or

3. Issues beyond the scope of this RMP.

The BLM will provide an explanation in the Draft RMP/Draft EIS as to why an issue is placed in category two or three. The public is also encouraged to help identify management questions and concerns that should be addressed in the RMP. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The BLM will use an interdisciplinary approach to develop the RMP in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Wildlife and fisheries; threatened and endangered species; special status species; vegetation; invasive and noxious weeds; renewable energy; lands and realty; minerals management; outdoor recreation; off highway vehicle and transportation; air resources; visual resources; cultural resources and Native American concerns; paleontology; hydrology; public safety; law enforcement; fire ecology and management; forestry; rangeland management; sociology and economics; and Geographic Information Systems.

Authority: 40 CFR 1501.7, 43 CFR 1610.2.

Amy Lueders,

Nevada State Director.

[FR Doc. 2012–4198 Filed 2–23–12; 8:45 am]

BILLING CODE 4310–HC–P

Carson City District RMP Revision Scoping Period Initiated

The Bureau of Land Management (BLM) Carson City District (CCD) of the announces the beginning of a 60-day Public Scoping period for the Carson City District Resource Management Plan (RMP) revision process. The revision process involves the preparation of an Environmental Impact Statement (EIS). The BLM published a *Notice of Intent to Prepare an RMP/EIS* in the *Federal Register* on February 24, 2012, which kicks off the scoping period. Members of the public, Tribal organizations, and other agencies and organizations are invited to submit comment during this period. Six public scoping meetings will be held across the region; details are provided below. Written comments may be submitted through **April 29, 2012**, by any of the following methods: e-mail: BLM_NV_CCDO_RMP@blm.gov, Fax: 775-885-6147, mail or other delivery service: BLM Carson City District, Attn: CCD RMP, 5665 Morgan Mill Rd, Carson City, NV 89701.

Public Scoping Meetings

Fallon Convention Center	100 Campus Way, Fallon, NV 89406	Tue Mar 13, 4-6pm
Lyon County Library	20 Nevin Way Yerington, NV 89447	Wed Mar 14, 4-6pm
Mineral County Library	110 1st St, Hawthorne, NV 89415	Thu Mar 15, 4-6pm
Carson Valley Inn	1627 US Highway 395 N, Minden, NV 89423	Tue Mar 27, 5-7pm
Hyatt Place Reno Airport	1790 East Plumb Lane, Reno, NV 89502	Wed Mar 28, 5-7pm
Carson City Library	900 North Roop St, Carson City, NV 89701	Thu Mar 29, 5-7pm

BLM

US Department of the Interior
Bureau of Land Management
c/o EMPSi*
3740 Lakeside Drive, Suite 101
Reno, NV 89509

**Acting as contracted agent for the Bureau of Land Management*

Add Your E-mail to the Mailing List
If you received this postcard and did not receive the electronic newsletter, we probably do not have your e-mail address. You can request to be added to our electronic mailing list by sending a message to BLM_NV_CCDO_RMP@blm.gov.

March 2012

BLM Nevada News

Carson City District Office No. CCDO 12-19
For Release: February 24, 2012
Contact: Lisa Ross, 775- 885-6107, lross@blm.gov

BLM Carson City District Announces the Notice of Intent to Prepare a Revision to the Resource Management Plan

Carson City, Nev. — The Bureau of Land Management (BLM) Carson City District, Sierra Front and Stillwater Field Offices are seeking public comments to identify issues and concerns that should be analyzed the Carson City District Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The BLM is also seeking nominations for areas of critical environmental concern and information on lands that may possess wilderness characteristics. A Notice of Intent to prepare the RMP and conduct an EIS was published in the *Federal Register* on February 24, 2012, formally opening a 60-day public scoping period which will end April 29, 2012.

The planning area is located in portions of 12 counties within two states (Washoe, Storey, Carson City, Douglas, Lyon, Churchill, Mineral, and Nye counties within Nevada, and Sierra, Alpine, Plumas, and Lassen counties within California), and encompasses approximately five million acres of public land.

Public scoping meetings will be held from 4:00 to 6:00 p.m., on March 13, at the Fallon Convention Center (100 Campus Way) in Fallon, Nev., on March 14, at the Lyon County Library (20 Nevin Way) in Yerington, Nev., on March 15, at the Mineral County Library (First & A Street) in Hawthorne, Nev. Additional public scoping meetings will be held from 5:00 to 7:00 p.m., on March 27, at the Carson Valley Inn (1627 US Hwy 395 N) in Minden, Nev., on March 29, at the Carson City Library (900 N. Roop Street) in Carson City, Nev., and on March 28, at the Hyatt Place (1790 E. Plumb Lane) in Reno Nev.

To submit comments, fill out and print the mail-in (or fax-in) comment form. The comment forms are available at the Carson City District website at: www.blm.gov/nv/st/en/fo/carson_city_field.html. Comments may be submitted by e-mail to BLM_NV_CCDO_RMP@blm.gov or delivered to the BLM office at 5665 Morgan Mill Rd, Carson City, NV 89701, Attn: Carson City RMP; or faxed to 775-885-6147, Attn: Carson City RMP.

Comments are welcomed, reviewed, and considered throughout the planning process. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your

personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

For more information regarding the public meetings or the proposed project, call Colleen Sievers at 775-885-6000.

--BLM--

* ALVIN AND CHIPMUNKS (PG)
Mon - Fri 4:10
Sat & Sun 1:10 4:10

* GONE (PG-13)
Fri - Thur
7:10

* GIRL W DRAGON TATTOO (R)
Mon - Fri 7:00
Sat & Sun 1:00 7:00

* UNDERWORLD AWAKEN (R)
Fri - Thur
4:00

Showtimes good for Friday, 3/23 thru Thursday 3/29
* Special Engagement - No Passes or coupons

The Bureau of Land Management (BLM) Carson City District is seeking public comments to identify issues and concerns that should be analyzed the Carson City District Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

The BLM is also seeking nominations for areas of critical environmental concern and information on lands that may possess wilderness characteristics.

A Notice of Intent to prepare the RMP and conduct an EIS was published in the Federal Register on February 24, 2012, formally opening a 60-day public scoping period which will end April 29, 2012.

A Public scoping meeting will be held on March 29, 5:00 to 7:00 p.m. Carson City Library (900 N. Roop Street, Carson City, Nev.

RJ-0000411240

GALAXY FANDANGO
At The Casino Fandango
882-7469

ALL DLP DIGITAL PROJECTION
100% STADIUM SEATING

★ **THE HUNGER GAMES** (PG-13)
10:00 10:30 11:40 12:10 12:40 1:10 1:40 3:20 3:50 4:20 4:50 6:00 6:30 7:00 7:30 8:00 9:10 9:40 10:10 10:40

THE HUNGER GAMES (PG-13)
12:40 3:50 7:00 10:10

★ **21 JUMP STREET** (R)
11:45 12:15 2:25 2:55 4:55 5:25 7:25 7:55 10:00 10:30

★ **DR. SEUSS' THE LORAX 3D** (PG)
2:10 4:30 7:15 9:30

★ **DR. SEUSS' THE LORAX** (PG)
11:45

★ **JOHN CARTER 3D** (PG-13)
3:30 6:45 9:55

★ **JOHN CARTER** (PG-13)
12:15

ACT OF VALOR (R)
12:10 2:50 5:25 7:45 10:20

Showtimes good for Sunday, March 25, 2012

★ - SPECIAL ENGAGEMENT
NO PASSES OR COUPONS

Tickets available online at
WWW.GALAXYTHEATRES.COM

meralda Place, Minden. Enter through side door — 12 Step Program. Learning to enjoy life, rather than just survive ... For more info, see "Am I CoDependent?" at coda.org. (No beverage service.) Call 775-230-5333.

New Jazz and Tap classes for Teens, 4:30-6:30 p.m., Positive Energy, 3603 Challenger Way, Carson City — Beginning Jazz for teens & adults Mondays 4:30, and Beginning Tap at 5:30.

Listen and Learn Al Anon meeting, noon to 1:30 p.m., located at the Carson City Senior Center in the Zephyr room — Support group for family and friends of alcoholics. We share in support of others in the same or similar situations. Your anonymity is protected at all times. Call 775-315-0030.

Muscle Powered Walk, 5:30-7 p.m., various locations within in Carson City — One- to 1.5-

preserve the personal accounts of American war veterans. Call 775-790-5050.

NxLeveL for Entrepreneurs — Carson City, 5:45-8:45 p.m., Business Resource Innovation Center (BRIC), 108 East Proctor Street, Carson City — NxLeveL is a 13-session intensive training program designed to encourage small business expansion and promote economic development. It focuses on teaching the art of better business practices while producing a comprehensive business plan to guide business expansion, decisions and activities. Call 775-784-6879.

Kit Carson Toastmasters weekly meeting, 6:30-7:30 a.m., Grandma Hattie's Restaurant, 2811 S. Carson St., Carson City. Improve your communications abilities in a fun setting. Breakfast guests always welcome. Call 775-885-7579.

Books and Brag story time, 9:30-10:30 a.m., Children's Museum of Northern Nevada, 813 N. Carson St., Carson City — Story time for pre-schoolers. Call 775-884-2226.

Jenny Robinson: Elapsed in Time Exhibition, 9 a.m. to 5 p.m., 885 East Musser Street, Carson City — Call 775-450-3842.

Comma Coffee Salsa Dancing Lessons, 7-9 p.m., Comma Coffee, 312 S. Carson St. (across from Legislature), Carson City, 775-883-2662 — Casual atmosphere, no partner needed. Beginners class: 7 p.m.; Intermediate class: 8 pm. $5. Call 775-882-8451.

See **Calendar,** *Page* **A9**

Today

Carson City Community Bingo, 12:30-3:30 p.m., Carson City Senior Citizen Center, 911 Beverly Drive, Carson City — Carson City Community Bingo. Fundraiser for "Meals On Wheels" and the Carson Senior Center. Doors open at 11 a.m. Games start at 12:30 p.m. Buy-in: $10; Early Birds/Night Owls: $3. All Specials: $1. Cash Ball: $1. Snacks available. Must be 21 or older to play. Call 775-883-3430.

JJ Heller and Audrey Assad Live in Concert, 7 p.m., The Rock Church (4950 Vista Blvd. Sparks) — Come join us for an awesome night of music and worship for the whole family. Tickets start at $12. Call 775-750-4431.

Open Mic/Jam Night @ Carson Lanes, 7-11 p.m., Eleventh Frame Winner's Lounge, Carson Lanes Retail Center, 4600 Snyder Ave., Carson City — Host Dean Brownell. Bring your own instruments or use ours. Spectators welcome. No cover and smoke-free. Call 775-883-2606.

El Buen Pastor, 2-4 p.m., 150 E. Roland St. — *Te invitamos a los servicios todos los Domingos a las 2 p.m.* Call 775-461-9632.

Journaling as a Spiritual Quest, 1-4 p.m., Center for Spiritual Living Carson City, 1927 N. Carson Street — Spiritual Enlightenment through Journaling is being explored every Sunday throughout March. Journals will be available. Each class begins with a five-step process; a ritual of preparation, sitting down with intent, focusing to calms the mind, allowing profound silence and gentle return. Four basic writing exercises will be explored. This is an eight-week class; however, each session will reveal new practices so drop ins are welcome. Love donations accepted. Call 775-882-0901.

Open Heart Ministry Spiritual Gathering, 4:30-5:30 p.m., Genoa Community Church, Genoa. The gathering will blend music, meditation, and a message based on the spiritual teachings of the Unity movement and is led by Rev. Maryellen Youngs, ordained Unity minister, assisted by Nadine Allen, pianist, vocalist, and spiritual seeker. Anyone who desires an inspiring experience and loving fellowship is invited to attend. Call 775-720-7702.

Sunday Celebration Services, 10 a.m. to noon, 1927 North Carson St. Come and get spiritually fed at the Center for Spiritual Living in Carson City. Meditation begins at 10 a.m., and the celebration service starts at 10:30. Non-dogmatic, spiritually uplifting, every Sunday. Call 775-882-0901.

Snow White Goes West, 7:30-9:30 p.m., CVIC Hall in Minden — Musical comedy set during the Calif. Gold Rush pitting heroine against saloon hall owner Queenie & Sneaky Sam. All ends well thanks to marshal Joe Prince and the seven prospecting Dwarf brothers. Call 775-292-0939.

TheatreWorks of Northern Nevada presents dark comedy "Dead Man's Cell Phone," 2 p.m., Laxalt Auditorium in the Nelson Building, 401 W. 2nd St., Reno — A woman in a café, a cell phone that keeps ringing and the owner of the phone no longer among the living are the elements that set up a biting comedy that is the next presentation of TheatreWorks of Northern Nevada. "Dead Man's Cell Phone" finds humor in confronting assumptions about morality, redemption and the need to connect in a technologically obsessed world. The play will be presented at 2 p.m. March 25. The local cast of four is directed by Holly Natwora. This play is suitable for ages 16 and older. General admission tickets are $12; senior and student tickets are $10. Call 775-284-0789.

CARSON STADIUM CINEMAS

2571 N. Carson St. Carson City

775-841-7469

All Seats And Shows $3.00

* JOURNEY 2 (PG) Mon - Fri 7:10 Sat & Sun 1:10 7:10

* THE WOMAN IN BLACK (PG-13) Mon - Fri 7:00

* CHRONICLE (PG-13) Fri - Thur 4:10

* THE DESCENDANTS (R) Fri - Thur

Monday

Jenny Robinson: Elapsed in Time Exhibition, 9 a.m. to 5 p.m., 885 East Musser Street, Carson City — Call 775-450-3842.

ADULT WORSHIP CLASS, 6-7 p.m., The Performing Arts Project, 2556 Precision Drive, Minden (off Johnson Lane & Wildhorse) — Christian-based adult Worship Dance Class. Call 775-267-4446.

Evening Community Bible Study, 6:55-8:30 p.m., LifePoint Church, 1095 Stephanie Way, Minden — Study the Gospel of John. This is a non-denominational Bible Study via small group discussions followed by a large group teaching format. Call 775-267-6744.

Book Launch: Nevada State Prison, 6-7:30 p.m., Carson City Library, 900 North Roop Street — Carson City Library will present the official book launch of "Nevada State Prison," published by Arcadia Publishing and to be released on Monday, March 26, at 6 p.m. The authors of this book include Jennifer E. Riddle, an archaeologist; Sena M. Loyd, a research librarian; and Stacy L. Branham and Curt Thomas, officers of the Nevada State Prison. Call 775-887-2244, ext. 1019.

CoDependent's Anonymous, 6:15-7:15 p.m., Coventry Cross

Taught by Michelle Michelsen. $85/8 weeks for one class, $150/8 weeks for both. Call 775-884-3633.

Tuesday

Basic Dog Obedience, 6:30-7:30 p.m., Fuji Park. Guy Yeaman's Basic Dog Obedience Class, sponsored by Carson City Recreation; March 6 through April 24. Cost is $80 for the six one-hour lessons. By using positive training methods, Guy will use his 45+ years of experience to help you to teach your dog all of the basic obedience commands: heel, sit, stand, stay and come to you. During the session, Guy will address any and all issues you may have with your dog. Each dog needs to be current on all shots. Records must be shown at the time of registration. Dogs will need a training collar (choke chain, Halti, Martingale, head harness, etc.) and a 5' - 6' fabric or leather leash. For further info, call Guy at 775-265-4530.

Open Studio for Potters, 10 a.m. to 1 p.m., Brewery Arts Center Pottery Studio — Open studio time for potters at the Brewery Arts Center. $50 per month includes glazes and firing. Tuesdays: 10 a.m. to 1 p.m. or 5:30-8:30 p.m. Call or email for registration information. Call 775-220-2094.

Compassionate Friends Meeting, 7-9 p.m., Carson Tahoe Cancer Resource Center, 1535 Medical Parkway, Carson City — A grief support group for families experiencing the death of a child. The group meets the last Tuesday of the month. Call 775-883-3132.

hour walk, level to some elevation gain. Go to www.muscle powered.org and click on "Calendar" to find out where to meet. Call 775-315-6763.

Chamber's Luncheon Speaker Series: "Soup's On" 11:30 a.m. to 1 p.m., Gold Dust West, 2171 U.S. Highway 50 East, Carson City — Chamber's Luncheon Speaker Series: "Soup's On," in partnership with Gold Dust West. Joel Dunn: Youth Sports Director, Carson City Recreation Division. Cost: $15 in advance; $20 at the door. RSVP by 3/20. Call 775-882-1565.

Gold Hill Hotel Tuesday Lecture Series, 5-9 p.m., Gold Hill Hotel, 1540 Main St., Gold Hill, one mile south of Virginia City on Highway 342 — Dianna Maria de Borges in a Chautauqua Performance as Sarah Winnemucca Hopkins (1844-1891). Buffet dinner and lecture: $15; or lecture only: $5. Buffet served from 5-7 p.m. Lecture begins at 7:30 p.m. Reservations recommended but not required. Call 775-847-0111.

NARFE meeting, 2-4 p.m., Carson Valley United Methodist Church, 1375 Centerville Lane, Gardnerville. — Federal Retirees. The National Active and Retired Federal Employees Association (NARFE), Chapter 2167 monthly meeting. Call 775-265-9500.

Northern Nevada LST Association Meeting, 11:30 a.m. to 1 p.m., Grandma Hattie's Restaurant, 2811 S. Carson St., Carson City — The association is now active and holding monthly meetings. Open to all U.S. Navy veterans of amphibious forces from all eras. Our goal is to

getting as close as securi-
y would allow to the col-
ege in Leon where the
ontiff is staying during
is three-day visit to
Mexico.

"We sang with all our
eart and all our force,"
aid Maria Fernanda de
una, a member of the
roup. "It gave us goose
umps to sing 'Las Ma-
anitas' for him."

Benedict has taken up
ope John Paul II's drive
reach out to young Ro-
an Catholics, following
his footsteps by rally-
g millions of young
aithful to join him for
Vorld Youth Days, the
atholic youth festivals
eld once every three
ears. The next edition is
cheduled for Rio de Ja-
eiro next year.

His only public re-
arks Saturday were
anned for a meeting
ith about 4,000 children
Peace Plaza in the city
Guanajuato. He was
pected to refer again to
e need for them to stay
way from the drug-

to re-evangelize parts of the world where Catholicism has fallen by the wayside, trying to rally the next generation to embrace a faith that their parents may have abandoned. While Europe has certainly been Benedict's focus to date, Mexico also has seen its number of Catholics fall.

"The Mexican church

ticularly concerning the church's treatment of sexual abuse.

On the second day of the pope's visit, victims of priest Marcial Maciel launched a new book containing documents on the Vatican's alleged cover-up of sexual abuse of seminarians by Maciel, the founder of the Legionaries of Christ.

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The Bureau of Land Management (BLM) Carson City District is seeking public comments to identify issues and concerns that should be analyzed the Carson City District Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

The BLM is also seeking nominations for areas of critical environmental concern and information on lands that may possess wilderness characteristics.

A Notice of Intent to prepare the RMP and conduct an EIS was published in the *Federal Register* on February 24, 2012, formally opening a 60-day public scoping period which will end April 29, 2012.

A Public scoping meeting will be held on March 28, 5:00 to 7:00 p.m. Hyatt Place, 1790 E. Plumb Lane Reno Nevada.

SUNDAY ETC.

EARTHWEEK: DIARY OF THE PLANET

Plan to repopulate West with buffalo has begun

Earth Environment Service

A controversial plan to repopulate the grasslands of the western United States with genetically pure bison from Yellowstone National Park got under way in the dark of the night on Wednesday.

Sixty-four of the animals, also known as buffalo, were shipped to Montana's Fort Peck Reservation, where they will be bred by Native Americans who often regard them with spiritual reverence.

Many of what are called buffalo in the grasslands of the Great Plains are actually hy-

made the discovery at levels said to be well below the Japanese government's provisional limit of 500 becquerels per kilogram for seafood.

They say that further studies are needed because the radioactive isotope is likely to have accumulated in fish that eat the plankton.

Meanwhile, the Environment Ministry announced that levels of cesium have soared to 154,000 becquerels per kilogram in soil around the Fukushima prefecture village of Iitate.

Volcanic activity

ing through the debris plume.

Earth images

NASA satellite-image analysts were puzzled by a pale-green tint that appeared during late February in the sea ice off the coast of East Antarctica.

And since there was no immediate way to place "eyes on the ground" in the extremely remote region, NASA enlisted several experts around the world to help determine what was causing the green color.

Oscar Schofield, a biological oceanographer at Rutgers University, had his own long dis-

NEWS OF THE WEIRD

ND town considers pretend hangings

Associated Press

BISMARCK, N.D. — The mayor of the southwest North Dakota tourist town of Medora is seeking permission for a hanging, and he is sticking his neck out by volunteering to be the one to go to the gallows.

Mayor Doug Ellison wants to erect a gallows on his property to stage mock hangings for tourists, and he has taken his request to the city's Planning and Zoning Commission.

"The matter was not on the agenda and they were a little taken aback," Ellison said.

The commission, of which

probably just looking for a warm place to sleep.

The van's driver left from Marin County and spent the night in a Mill Valley parking lot before heading out Wednesday morning for Santa Cruz.

He didn't stop until he reached a gas station in the beachfront city, where he heard a distinct meowing. He opened the hood and found the kitten with a blue, studded collar and blue bell but no identification.

The shelter is trying to locate the owner.

Manager lays self off

BLM Nevada News

Carson City District Office No. CCDO 12-19
For Release: March 5, 2012
Contact: Lisa Ross, 775- 885-6107, lross@blm.gov

BLM Carson City District Announces the Notice of Intent to Prepare a Revision to the Resource Management Plan

Carson City, Nev. — The Bureau of Land Management (BLM) Carson City District, Sierra Front and Stillwater Field Offices are seeking public comments to identify issues and concerns that should be analyzed the Carson City District Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The BLM is also seeking nominations for areas of critical environmental concern and information on lands that may possess wilderness characteristics. A Notice of Intent to prepare the RMP and conduct an EIS was published in the *Federal Register* on February 24, 2012, formally opening a 60-day public scoping period which will end April 29, 2012.

The planning area is located in portions of 12 counties within two states (Washoe, Storey, Carson City, Douglas, Lyon, Churchill, Mineral, and Nye counties within Nevada, and Sierra, Alpine, Plumas, and Lassen counties within California), and encompasses approximately five million acres of public land.

Public scoping meetings will be held from 5:00 to 7:00 p.m., on March 27, at the Carson Valley Inn (1627 US Hwy 395 N) in Minden, Nev., on March 28, at the Hyatt Place (1790 E. Plumb Lane) in Reno Nev., and on March 29, at the Carson City Library (900 N. Roop Street) in Carson City, Nev.

To submit comments, fill out and print the mail-in (or fax-in) comment form. The comment forms are available at the Carson City District website at: www.blm.gov/nv/st/en/fo/carson_city_field.html. Comments may be submitted by e-mail to BLM_NV_CCDO_RMP@blm.gov or delivered to the BLM office at 5665 Morgan Mill Rd, Carson City, NV 89701, Attn: Carson City RMP; or faxed to 775-885-6147, Attn: Carson City RMP.

Comments are welcomed, reviewed, and considered throughout the planning process.
Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

For more information regarding the public meetings or the proposed project, call Colleen Sievers at 775-885-6000.

--BLM--

For the BLM to formally consider your comments regarding the Notice of Intent for the Carson City District to prepare a Resource Management Plan, written comments are required. To assure consideration you should provide your comments ***by April 29, 2012***. Please fax this completed form to 775-885-6147 (Attention: Carson City RMP) or mail it to the following address:

Attention: Carson City RMP
Bureau of Land Management
5665 Morgan Mill Road
Carson City, NV 89701

You may e-mail comments to BLM_NV_CCDO_RMP@blm.gov or complete an online comment form at http://www.blm.gov/nv/st/en/fo/carson_city_field.html. **In order to continue receiving information and future mailings about the Carson City District RMP, you must ask to be added to the official RMP mailing list by submitting this form or otherwise providing your contact information via email, fax or letter.**

* Denotes required fields.

Your Name* _____ Today's Date* _____

Please indicate your affiliation by checking **one** of the following boxes:

☐ Individual (no affiliation)
☐ Citizen's Group
☐ Federal, state, tribal, or local government
☐ Private Industry
☐ Elected Representative
☐ Regulatory Agency

Confidentiality Request:

Please indicate if you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act. This request does not preclude the need to complete the required information below.

A request for confidentiality will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses.

No selection indicates you do not wish to withhold your information.

☐ Please withhold my name only
☐ Please withhold my address only
☐ Please withhold my name and address

Name of company, group, government, agency or organization (if applicable) _____

Mailing Address* _____

City* _____ State* _____ Zip Code* _____

Telephone (optional) _____ E-mail Address (optional) _____

Would you like to be added to or remain on the CCD RMP/EIS mailing list to receive future project-related information?

Yes ☐ No ☐

Continued on next page >>>

Please mark the appropriate category below and write your comments on the lines provided. Feel free to attach additional pages if necessary.

- ☐ Access/Transportation
- ☐ Energy (Wind, Geothermal, Solar, etc.)
- ☐ Fire Management
- ☐ Historic, Cultural & Paleontologic Resources/Traditional Values
- ☐ Land Tenure (Retention/Acquisition/Disposal)
- ☐ Livestock Grazing
- ☐ Minerals (Hard rock, Oil & Gas)
- ☐ Planning/RMP Process
- ☐ Soil / Water / Air / Visual Resources
- ☐ Recreation/OHV (Hunting, Fishing, Hiking, Biking, etc.)
- ☐ Social/Economic Concerns
- ☐ Vegetation/Noxious Weeds
- ☐ Wild Horses & Burros
- ☐ Wilderness, Wilderness Study Areas & Other Special Designations
- ☐ Wildlife/Sensitive Species
- ☐ Other Concerns (please define)

Public comments submitted for this planning review, including names and street addresses of respondents, will be available for public review at the Carson City District Office, 5665 Morgan Mill Road, Carson City, NV 89701, during regular business hours (7:30 AM to 4:30 PM), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your written comments. Such requests will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses.

Appendix B

List of Commenters

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APPENDIX B
LIST OF COMMENTERS

The formal public comment period as required by NEPA began on February 24, 2012, with the publication of a Notice of Intent in the *Federal Register*, and ended on April 29, 2012. **Table B-1**, Commenters, lists the commenters who submitted written submissions to the BLM for the CCD RMP/EIS as part of the public scoping process. All comments received on or before May 5, 2012, were included in this scoping report. Commenters that submitted more than one letter are only listed once and commenters that requested their names be withheld and form letter submissions are not included in **Table B-1**, Commenters. **Table B-2**, Form Letter Submissions, includes a brief description of the form letters received, including number of letters received.

Table B-1
Commenters

	Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
		Federal Government Agency	
1.	Lee Kreutzer	National Park Service	4/24/2012
		State Government Agency	
1.	Skip Canfield	State Land Use Planning Agency	4/25/2012
2.	Rebecca Palmer	State Historic Preservation Office	4/25/2012
3.		Nevada Department of Wildlife	5/02/2012
		Local Government Agency	
1.	Jennifer Budge	Washoe County Regional Parks and Open Space	4/27/2012
2.	Jeff Page	Lyon County	4/23/2012
		Business/Commercial Sector (if applicable)	
1.	Mike Sondermann	Black Mountain Outfitters	5/02/2012
2.	Greg Burns	Dirt Tricks, Inc.	4/30/2012
3.	Casey Folks	Best In the Desert	4/20/2012
4.		Magma Energy	4/24/2012

Table B-1
Commenters

	Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
		Tribal Government	
1.	Merlyn Dixon	Fallon Paiute Shoshone Tribe	5/01/2012
		Organization (non-profit, citizen's group)	
1.	Marjorie Sill	Sierra Club-Toiyabe Chapter	5/04/2012
2.	Harold Ritter	Coalition For Public Access	4/24/2012
3.	Susan Recce	National Rifle Association of America	4/30/2012
4.	Ginger Kathrens	The Cloud Foundation, Inc.	4/29/2012
5.	Deniz Bolbol	American Wild Horse Preservation Campaign	4/27/2012
6.	Rose Strickland	Sierra Club-Toiyabe Chapter	4/29/2012
7.	Henry Bisson	Public Lands Foundation	4/23/2012
8.	Jeremy Fancher	International Mountain Bicycling Association	4/30/2012
9.	Rob Mrowka	Center for Biological Diversity	4/27/2012
10.	Shaaron Netherton	Friends of Nevada Wilderness	4/30/2012
11.	Patrick Schmid	Pine Nut Mountains Trails Association	4/27/2012
12.	Kevin Joell	Tahoe Area Mountain Biking Association	4/28/2012
13.	Don Turner	Nevada Firearms Coalition	4/22/2012
14.		Canoe Hill Trail Association	4/29/2012
15.	Brian Hawthorne	Blue Ribbon Coalition	4/30/2012
16.	Ken Cole	Western Watersheds	4/27/2012
17.	Katie Fite	Western Watersheds	4/24/2012
18.	Barbara Warner	American Horse Defense Fund	4/29/2012
19.	Bill Hay	Carson Valley Trails Association	4/23/2012
20.	Curtis Johnson	Poedunks	4/28/2012
21.	Dale Beesmer	Poedunks	4/29/2012
		Individual	
1.	Carrol Abel		4/19/2012
2.	Dorothy Ainsworth		4/19/2012
3.	Allen Alexander		4/30/2012
4.	Gabino Alonso		4/20/2012
5.	Rachel Anderson		4/19/2012
6.	Paul Anderson		4/26/2012
7.	Scott Atchison		4/28/2012
8.	Yovonne Autrey-Schell		4/19/2012
9.	Hank Baker		3/27/2012
10.	Jim Barnard		4/20/2012
11.	Scott Barry		4/25/2012
12.	Jean Baugh		4/19/2012
13.	Clint Bentley		4/20/2012
14.	Henry Bertuleit		4/30/2012
15.	Fred Bianchi		4/20/2012
16.	Ed Bischofberger		4/24/2012
17.	Gale Bishop		4/19/2012

Table B-1
Commenters

	Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
18.	Corey Bolton		3/27/2012
19.	Jeffery Bonacci		4/23/2012
20.	Barbara Boros		4/19/2012
21.	Carla Bowers		4/29/2012
22.	Karla Boyd		4/19/2012
23.	Heidi Brautigam		4/13/2012
24.	Matthew Brennan		2/24/2012
25.	Don Bunch		4/20/2012
26.	Steve Burroughs		3/31/2012
27.	Kim Bush		4/25/2012
28.	Roberta Byrnes		4/19/2012
29.	Dave Canter		4/29/2012
30.	Steven Casci		4/2/2012
31.	Peter Cassidy		4/29/2012
32.	Linda Chard		4/30/2012
33.	Lee Chesterfield		4/20/2012
34.	Loren Chilson		4/20/2012
35.	John Clement		3/30/2012
36.	Carol Clover		4/19/2012
37.	Robin Cobbey		4/30/2012
38.	Debbie Coffey		4/29/2012
39.	Patrice Cole		4/25/2012
40.	Peggy Conroy		4/30/2012
41.	Nina Council		4/19/2012
42.	Gail Craven		4/19/2012
43.	John Crawford		4/27/2012
44.	Tami Crisanti		4/30/2012
45.	Dawn Crisanti		4/30/2012
46.	John Crumley		4/1/2012
47.	David Dahl		4/28/2012
48.	Taylor Dahlke		4/20/2012
49.	Nancy Darlington		4/19/2012
50.	Mary Davey		3/31/2012
51.	Ralph Deckard		3/16/2012
52.	Nate DeLaney		4/30/2012
53.	Denise DeLucia		4/29/2012
54.	Marybeth Devlin		4/29/2012
55.	Pat Dewar		4/19/2012
56.	Neil Dille		4/17/2012
57.	Richard Dillon		3/5/2012
58.	Talya Dodson		3/28/2012
59.	Dianne Douglas		4/19/2012
60.	Lynette Dumont		4/19/2012
61.	Ronald Duntley		4/13/2012

Table B-1
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
62. Mike Ebright		4/13/2012
63. Jon Edmondo		4/7/2012
64. Daan Eggenberger		4/30/2012
65. Todd Elam		4/27/2012
66. Virginia Emley		4/19/2012
67. Janet Enoch		4/25/2012
68. Helga Etscheidt		4/19/2012
69. Jerry Evans		4/18/2012
70. Wayne Fischer		3/28/2012
71. Katey Fiske		4/19/2012
72. Luci Fowler		4/19/2012
73. Joseph Fowles		4/24/2012
74. Ken Freeman		4/22/2012
75. Ron Frugoli		4/28/2012
76. Elyse Gardner		4/30/2012
77. Scott Garrison		4/30/2012
78. Rollin Gearhart		3/30/2012
79. Sandra Gentilli		4/19/2012
80. Jeanine Gillengerten		4/29/2012
81. John Gilliland		4/22/2012
82. Jeffery Gillis		4/30/2012
83. Kirk Gillis		4/28/2012
84. Mike Glock		4/13/2012
85. Simon Gonzalez		3/30/2012
86. Antje Gottert		4/27/2012
87. Elizabeth Graser-Lindsey		4/19/2012
88. Ava Green		4/19/2012
89. Laurie Greenwood		4/19/2012
90. Kathleen Gregg		4/29/2012
91. Lisa Griffith		4/30/2012
92. Gigi Grim		4/25/2012
93. Randy Halligan		4/15/2012
94. Bill Halvorsen		4/27/2012
95. J. Hawks		4/30/2012
96. Roger Heath		4/27/2012
97. Denine Heinemann		4/19/2012
98. Brandon Henning		4/25/2012
99. Justin Hensley		4/29/2012
100. Terry Herman		4/27/2012
101. Chuck Hilsabeck		4/27/2012
102. Mark Hogan		4/16/2012
103. Doug Holcomb		4/26/2012
104. James Hollaway		4/22/2012

Table B-1
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
105. Jen Horn		3/27/2012
106. David Horn		3/29/2012
107. Dottie Hudecek		4/19/2012
108. Mathew Humphrey		3/28/2012
109. Erik Hurd		4/27/2012
110. Buck Hurlbut		4/27/2012
111. Neil Jackson		4/21/2012
112. Gayle Janzen		4/19/2012
113. Bob Jasper		4/19/2012
114. Brooks Jelinek		4/21/2012
115. Norm Johanson		3/29/2012
116. Robert Johnson		4/26/2012
117. Don Johnson		4/15/2012
118. Karen Johnson		4/19/2012
119. Diane Kastel		4/22/2012
120. Cat Kindsfather		4/30/2012
121. Janet Kindt		4/19/2012
122. Lynn Kirk		4/19/2012
123. Bonnie Lynn Kohleriter		4/30/2012
124. Jim Kovacs		3/28/2012
125. Kathleen Kujat		4/25/2012
126. Jeff Kwak		4/25/2012
127. Barbara Laber		4/15/2012
128. David Lake		3/27/2012
129. Michael Lamb		4/13/2012
130. James Langan		4/29/2012
131. S. Elaine Lawson		4/19/2012
132. Lisa LeBlanc		4/30/2012
133. Erik Lee		4/17/2012
134. Beth Legenbauer		4/24/2012
135. Roy Leufkens		4/24/2012
136. Margaret Lewis		4/25/2012
137. Matt Lindsay		3/28/2012
138. Tricia Lopez		5/2/2012
139. T.J. Lovato		4/21/2012
140. Janna Lukens		4/19/2012
141. Charles Lundfelt		4/29/2012
142. Scott MacClymonds		4/19/2012
143. Marie Marinakis		4/19/2012
144. Susan Martin		4/19/2012
145. Michael Martin		4/24/2012
146. Dan Martin		3/29/2012
147. Paul Martinek		3/30/2012
148. Bob Martini		4/30/2012

Table B-1
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
149. Lauren Mathews		4/19/2012
150. Steve Mathews		4/30/2012
151. Benjamin Maulis		4/30/2012
152. Graham McDonald		4/19/2012
153. Brian Mckown		3/6/2012
154. Doris McQuiddy		4/19/2012
155. Patti Mehserle		4/13/2012
156. Carolyn Meier		4/14/2012
157. David Merrill		4/8/2012
158. Michael Michailoff		4/16/2012
159. Iris Miller		4/19/2012
160. Stanley Miller		5/3/2012
161. Lorene Mills		4/19/2012
162. Siedre Moderacki		4/19/2012
163. Rob Mrowka		4/18/2012
164. Janice Myers		4/19/2012
165. Lisa Norman		4/30/2012
166. Dorothy Nylen		4/29/2012
167. Nancy O		4/19/2012
168. P. Opperman		4/19/2012
169. Bryan Orr		3/28/2012
170. Sherry Oster		5/2/2012
171. Tyler Owens		3/28/2012
172. George Payerle		4/19/2012
173. Ryan Pedersen		4/4/2012
174. Julie Perez		4/19/2012
175. Gregg Perock		4/22/2012
176. Elaine Phelps		4/27/2012
177. Chris Posey		4/19/2012
178. Alan Proctor		4/27/2012
179. Jon Rampton		4/27/2012
180. Lee Rankin		3/28/2012
181. Kimberly Rhodemyre		4/25/2012
182. J.L. Rhodes		4/20/2012
183. Carlene Ridenour		4/19/2012
184. Skip Ritter		4/29/2012
185. Carin Robinson		4/30/2012
186. Norma Rockman		4/19/2012
187. Leonard Ross		5/2/2012
188. Kathy Rote		4/19/2012
189. Ana Salinas		4/19/2012
190. Brian Sandgren		3/30/2012
191. Edmun Santos		4/13/2012

Table B-1
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
192. Mark Schmidt		4/28/2012
193. Rebecca Schneider		4/30/2012
194. Lisa Schock		4/30/2012
195. Nylene Schoellhorn-Puha		4/19/2012
196. Kerry Schreck		4/21/2012
197. Loretta Sehlmeyer		4/19/2012
198. David Siegel		4/16/2012
199. Catherin Smith		4/28/2012
200. James Smith		4/25/2012
201. Don Smith		3/29/2012
202. Neal Spelts		3/28/2012
203. Carlene Steel		4/25/2012
204. Nancy Stewart		4/29/2012
205. Ken Stine		4/13/2012
206. John Struzik		4/21/2012
207. Michele Sullivan		4/19/2012
208. Rita Suminski		4/20/2012
209. Fred Svetz		4/25/2012
210. Lane Swall		3/14/2012
211. Tom Taflin		4/29/2012
212. George Taulman		4/13/2012
213. Scott Taylor		4/28/2012
214. Patrick Teixeira		4/25/2012
215. Lesli Thaxton		4/25/2012
216. Emry Thran		4/25/2012
217. David Toll		4/30/2012
218. Christopher Turbeville		4/28/2012
219. Phyllis Turner		4/19/2012
220. Kathy Valente		4/19/2012
221. Marlene VanDyke		4/25/2012
222. Ann Vassey		4/19/2012
223. Lana Verplank		4/19/2012
224. Merry vonBrauch		4/29/2012
225. Randall Wagner		3/30/2012
226. George Waite		4/10/2012
227. Judy Walker		4/19/2012
228. Cullen Watts		4/13/2012
229. Eva Wawrowski		4/19/2012
230. Lori White		4/19/2012
231. Stuart Wik		3/28/2012
232. Sara Williams		4/25/2012
233. Josh Wilson		4/30/2012

Table B-1
Commenters

Commenter Name[1]	Affiliation	Date Submitted (Month/Day/Year)
234. Margaret Wilson		4/19/2012
235. Tracey Jean Wolfe		4/27/2012
236. Victor Yohey		3/30/2012
237. Jeff Yoshimura		4/27/2012
238. Dale Young		4/28/2012
239. Ron		4/16/2012

[1]Table does not include form letters submissions; refer to Table B-2, Form Letter Submissions.

Table B-2
Form Letter Submissions

Date First Letter Received (Month/ Day/Year)	Organization Identified (if any)	Number of Form Letters Received	Number of Form Letters with at Least One Unique Comment	Description of Form Letter Contents
04/19/2012	WHA Form Letter	3,121	75	Wild Horses and Burros
04/29/2012	WHB Form Letter	33	8	Wild Horses and Burros
04/10/2012	CH Form Letter	11	0	Canoe Hill Trails
02/29/2012	SM Form Letter	316	1	Sand Mountain Recreational Area
03/28/12	OHV Form Letter	57	0	Recreation on BLM lands
04/28/12	MB Form Letter	5	1	Mountain Biking on BLM Lands

Appendix C

Comments by Resource Planning Issue

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APPENDIX C
COMMENTS BY RESOURCE PLANNING ISSUE

The BLM received 1,692 discrete comments during the Carson City RMP scoping period. These comments were classified by RMP process category and by planning issue. Comments for each of the RMP process categories and for planning issue categories are included in this appendix. Comments are included verbatim from the comment letters. Comment letters can be viewed in their entirety at the CCD in Carson City, Nevada. Comments are included for the following groups:

COMMENTS BY PROCESS CATEGORY:

Table C-1 General Comments Outside the Scope of the RMP

Table C-2 Comments Related to Issues to Be Solved by National Policy

Table C-3 Comments Related to Implementation Actions

GENERAL COMMENTS RELATED TO THE RMP:

Table C-4 General Comments Related to the RMP

COMMENTS BY PLANNING ISSUE:

Issue 1: Restoring Ecological Health
Table C-5

Issue 2: Air and Atmospheric Values
Table C-6

Issue 3: Water Resources
Table C-7

Issue 4: Cultural Resources, Native American Religious Concerns, and Paleontology
Table C-8

Issue 5: Visual Resource Management
Table C-9

Issue 6: Special Status Specie-Wildlife
Table C-10

Issue 7: Fish and Wildlife
Table C-11

Issue 8: Wild Horses and Burros
Table C-12

Issue 9: Fire Management
Table C-13

Issue 10: Livestock Grazing
Table C-14

Issue 11: Recreation and Visitor Services
Table C-15

Issue 12: Lands and Realty
Table C-16
Issue 13: Mineral Resources
Table C-17

Issue 14: Hazardous Materials
Table C-18

Issue 15: Special Designations
Table C-19

Issue 16: Renewable Resources
Table C-20

Issue 17: Socio-Economics
Table C-21

Issue 18: Environmental Justice
No Comments: No Table

Issue 19: Sustainable Development
No Comments: No Table

Issue 20: Comprehensive Travel and Travel Management
Table C-22

Issue 21: Cave and Karst Resources
No Comments No Table.

Issue 22: Urban Growth
Table C-23

Issue 23: Forest/Woodland Management
Table C-24

Issue 24: Geology and Soils
Table C-25

Issue 25: Drought Management/Climate Change
Table C-26

Issue 26: Public Health and Safety
Table C-27

Issue 27: Other Resource Concerns
Table C-28

TABLE C-1

Table C-1
General Comments Outside the Scope of the RMP

Predator Killing on Public Land Managed by BLM: All killing of natural predators on public land managed by BLM must be stopped immediately. Every year, USDA Wildlife Services kills large numbers of birds and mammals across the United States to protect livestock and other resources including 450,347 animals in Nevada alone between the years of 2006-2011. This is an atrocious waste of federal resources done completely for the livestock stakeholders, not to mention this killing is a cruel and inhumane destruction of America's wildlife. Read more here: http://www.sacbee.com/2012/04/28/4448951/interactive-graphic-animals-killed.html#storylink=cpy http://www.sacbee.com/2012/04/28/4450678/the-killing-agency-wildlife-services.html http://www.sacbee.com/2012/04/28/4448951/interactive-graphic-animals-killed.html http://www.sacbee.com/2012/04/28/4450686/ex-trapper-leg-hold-device-probably.html
Scoping Handout - 9.1 Wild Horse & Burro Using the acreage that was designated to WH&B at the time of the 1971 act of approximately 53.3 million acres (42M BLM managed) and using BLM's own maximum 240 acres per horse per year (half of this usage per burro) statement the WH&B legally designated land could today accommodate 222,083 WH&B although anyone with any wildlife science training would know, with other wildlife and with natural predators on those lands the WH&B population would self-stabilize on their legal Herd Area acreage and never come close to that total. "Report to Congress Regarding the WH&B Program, BLM, US DOI: Refuting FY 2011 Budget Justification", C. Bowers, L. Peeples, C.R. MacDonald. http://www.blm.gov/nv/st/en/prog/wh_b/appropriate_management.html
Killing predators using taxpayer dollars to lessen the impacts on privately owned livestock that graze at a deficit on federal lands is unpopular with the American public and shortsighted from a fiscal standpoint. A balance of predator and prey is by far the most cost effective way to manage wild horse populations. BLM states that the wild horse has "virtually no natural predators." That is patently untrue. What is true is that BLM is complicit in eliminating any predator that could kill a lamb or calf, or a wild horse foal on public lands. It is high time to stop this costly and cruel predator eradication program, and, as much as possible, to let nature call the shots. Defenders of Wildlife or other conservation groups would likely fund a program that reimburses any documented losses of livestock on private lands adjacent to naturally managed public lands.
Special Status Plants and Animals: We are unaware of BLM efforts to conserve and recover TES species in the CCD. Have any species been recovered and delisted? The RMP should address these current efforts and strengthen and improve BLM actions if they have been unsuccessful in achieving recovery objectives.

Table C-1
General Comments Outside the Scope of the RMP

It should be noted, and incorporated into the decision-making process, that in recent years much in the way of world-class recreational opportunity has been provided for non-motorized public lands visitors. Here are just a few examples: • The Bridgeport Ranger District's recent travel planning process resulted in almost a blanket closure of all historic single-track motorcycle trails. That plan closed approximately 800-900 miles of dirt bike trails on Forest Service lands in the eastern Sierra from Peavine down to the Hoover Canyons Area. • The Eldorado National Forest nearby in the Sierra Nevada recently closed about 70% of its motorcycle and 4 wheel drives routes to the public in its current travel management plan. • Trails in the Ruhenstroth area were closed to protect paleontological resources
I personally find it disgusting that a man like John V. Winfield -- or any man -- can hold the health of the community in his hands -- and sacrifice it for his private profit if he chooses. Yet isn't that what he is doing today, stirring the toxins up into the wind and sending them into our homes for his own benefit?
Personal feelings aside I urge you to take the Storey County BLM lands off the list of disposable properties. Our valuable Historic Landmark and the state Historic District need all the federal oversight and protection they can get, and so do those of us who live here.
We rely on the BLM to implement safeguards to ensure the rights of the public to use certain roads, commonly known as RS 2477 roads (whether or not the road has been adjudicated).
As a biker and as an equestrian I am concerned with the proposed change to the Spooner backcounty that would allow mountain bikes between the Spooner and Laxalt Property. At this point I think it is in the best interest of both bicycles and horses that the trails remain separate. Having ridden the bike portion I know that I fly along on my bike and I was concerned for pedestrians hiking the trail while I was riding my bike because of the steep grade on the return, I can't imagine what it would be like if I were on the horse portion because there is not enough room to maneuver.
My name is Carolyn Meier and I'm and avid endurance rider, part of the group Nevada All State Trail Riders and ride up on this section of Tahoe Rim Trail every summer! I understand the mountain bikes would like to be able to get up here to make a straight shot for their long rides; however I think it would be too dangerous. As you know this part of the trail is a little dicey. Even on the horses, I'm just lucky I have a horse with a sound mind and who thinks about where he's putting his feet. If he were to have a bike come zipping around a blind turn at him, he would most likely bail off the trail, and there isn't really a good place to do this. Horses are flight animals and they aren't going to likely stand up to a scary mountain bike. We are constantly having the have the hikers, bikers, etc. talk to us so the horse knows it is a human. I would love for everyone to be able to see the views from the Snow Valley Peak section of the Tahoe Rim Trail, but I don't want a biker, horse or rider to become injured while enjoying the views.
I understand that there might be a possibility of opening the section of the tahoe rim trail from spooner to the laxalt properties to mountain bikes. That is a receipe for disaster and extremely dangerous.
Please remove the Wilderness Study Area designations to the extent possible. I recognize there is Congressional authority here, but I also understand that the RMP can (and should) have a plan for those areas supposing the WSA designation is removed. Those areas should be "open" or at most "limited" for recreational access and road/trail use.
Public/private cooperatives must adhere to all standards as any contractual agreement and must be made available for public comment and competitive bid. Any public cooperative that requires removal, handling or range repair (springs, fencing) must be reviewed carefully against any standard of conflict of interest. No allotment permittee for livestock grazing should hold any permit to remove wild horses from any public land.

Table C-1
General Comments Outside the Scope of the RMP

Buy out any surrounding private properties, as even if the owner presently are in favor of off highway vehicle use in the area, future private land owner may oppose O.H.V. use and try to shut Wilson canyon down.
The Poedunks mission is to maintain and enhance Peavines non-motorized trail network by volunteering to do trail maintenance, trail building and mountain clean ups by working with the U.S. Forest Service, Washoe County Parks, the City of Reno, and other Peavine user groups.
4. Historical, Cultural ....: Mr. Felix Ike of Elko, a Shoshone Indian with much leadership experience, volunteered to sit on BLM's Mgt. Resource Advisory Council. Why was he not seated? He is well known, respected and has worked to protect culturally sensitive areas.
AREA3: The Nightingale Mountains/Black Warrior Peak/Russell Peak/Winnemucca Dry Lake region is another exceptional and favorite riding area. I ride in this area about 4 times per year. It too should have a very high priority as a "dirt bike/OHV special area'. Races shold not be permitted in this particular area as overuse and trail damage will occur.
AREA2: Desert Peak/Cinnabar Hill and the area between Hot Springs Mountains and I-80 is one the best riding areas in all of northern Nevada. The sand dunes area south of the UPRR railroad is also a unique riding opportunity. I ride in the Area 2 outlined area 6 times per year and ask that this area be considered a "dirt bike/OHV special area". Races should not be permitted in this particular area as overuse and trail damage will occur.
AREA 4: The Seven Troughs area in particular is highly desirable for motorcycle rides and one I am just starting to explore. I plan to be in this area once per year.

TABLE C-2

Table C-2
Comments Related to Issues to Be Solved by National Policy

ALL estimated 53 million acres (42 million, BLM managed) of original designated Herd Area land is completely suitable for the long term management of wild horses and burros although this might require some ruffling of political feathers to accomplish since the past 40 years the BLM and associates have been chipping away at these legal WH&B lands and the recovery and reinstatement of WH&B would be unfavorable to any financial stakeholders, i.e. livestock permittees, mining and energy corporations, large lobbying trophy hunting clubs and many more. But let's face it the only persons that have worked for 40 plus years for the extinction of WH&B are those with a financial interest. This has been and continues to be unacceptable, illegal and we the public are disgusted at the sell-out of our lands and resources by the agency that is responsible to protect them BLM. This RMP is a great chance for the BLM to take the lead in repairing the destruction that they have been involved with for its entire existence as an agency both in plain sight and behind the public's back.
A "Thriving Natural Ecological Balance" cannot be done without allowing the WH&B to realize their natural place in the ecosystem. Contrary to the true intent of the law, you are marginalizing these national heritage species and treating them as misfits even within their legally designated Herd Areas, where they have a right to live naturally, unlike the livestock owners who have no permanent legal right to graze livestock but only a cancelable permit. A permit is not a right. The WH&B do have the legal right to graze on all Herd Areas.

Table C-2
Comments Related to Issues to Be Solved by National Policy

d. Trailhead installation and maintenance- I have assisted in installing a couple of these trail heads, great fun and bonding with fellow citizens ...assisted Fran Hull many years ago. i. Funding - suggest local funding process for businesses/clubs/organizations with interest to help cover the costs and maintenance of signage. This could be in the form of cash for "This sign was funded by: ABC company, XYZ company..." OR "In-Kind Donation for this sign was put forth by:..." you get the idea. I like the In-Kind as there are companies that make things... for example I have steel fab shop with powdercoating... I could donate materials, etc. for a Kiosk...BTW, I'm not looking for any money here...giving you an example of one persons interest in helping. Not sure what the verbiage would look like for a RMP but there needs to be active channels for citizens and business to contribute. Additionally have bi-annual updates of signs... Let's face it there are iD10T's (idiots) out there that vandalize signs so to keep them fresh there should be a way for citizens and business to contribute regularly. Note this funding could be applied to other areas above (e.g., Adopt a highway could be Adopt a Trail Network/system/trailhead/camping area)
ii. Volunteers at work -For example in CO (handled through Parks & Wildlife) they have $4M in grants (funded partially through OHV stickers) for: http://wildlife.state.co.us/SiteCollectionDocuments/DOW/Commission/2012/March/ITEM9OHVTrailsProgramGrants.pdf 1. We don't have this funding in place to my knowledge but it is a consideration for the future to potentially use a portion of these funds to assist the BLM in managing and maintaining our great land!
I want the BLM to reduce the population of wild horses and burrows from our public land.

Table C-2
Comments Related to Issues to Be Solved by National Policy

I am writing to express my opposition to the proposed trail access change, specifically the section of the Tahoe Rim Trail between Spooner Summit and Hobart Road. Mountain bikers typically like to go very fast downhill from my experience in this area. Opening it up to them will cause riders and their horses to be at risk of extreme danger due to the narrow trail, sharp turns and limited visiability. When a bicycle comes up on a horse unexpectedly, (as is the potential on this trail due to the many turns it makes going in and out of the drainages), it responds to its inherent "fight or flight" nature and spooks, jumping sideways. The drop-offs on these trails are so steep that a horse spooked could easily fall to its' death or be seriously injured, taking its' rider with it. There is no way to train a horse not to react to its' natural instinct when frightened. I have added this YouTube video of a horse (in a calm situation in an arena) that spooked so you may see the speed and distance a horse travels when trying to "flee" in a spook: http://www.youtube.com/watch?v=dHj0YKDTwXw I urge you to watch it, then imagine what would happen if the horse was on a narrow trail on the side of a steep mountain and startled by a mountain bike coming up behind or ahead of it. If this trail were the only option for Mountain Bikers to complete the Tahoe Rim Trail, it might be a bit easier to understand their desire to obtain access to this section. There is, however, a perfectly good multi-use trail below this section that most horseback riders avoid by using the newer trail to the west, giving them free access. Another consideration of concern re: opening this section up to bicycles is the edges of this trail are very fragile due to the width and altitude (lots of snow). Without considerable widening of the trail and destruction of vegetation in some areas, the trail will quickly become unrideable for everyone. I urge you to consider the consequences of potential injury or death before opening this trail up to use by bicyles.
Add WH&B as cultural resources in addition to their existing designation as natural resources. America's symbols of freedom, our Western heritage, on whose backs helped to create this country deserve more than a natural resource designation.
3. Do government monies need to be shifted from off the range to on the range management in the Wild Horse and Burro Program? With 75% of the $77 M going to off the range programs , 19% to program support, and only 5% to on the range programs, it appears this component of government is mismanaged and reallocation of monies to on the range programs need to done. The 1971 Law mandated the horses and burros be managed and protected on the range providing for healthy horses on healthy rangelands.
Most Americans including ME and other nations as well are strongly against horse slaughter. There needs to be laws in place to protect companion animals including horses.
Our national forests and Bureau of Land Management (BLM) lands were designed for "multiple use." Responsible individuals who need or want to use our public lands for various beneficial purposes should not be excluded. Management of our public lands is guided by the Multiple Use Sustained Yield Act of 1960 which encourages a wide variety of activities on our public land, provided that they take place in harmony with natural resource values. Resource management plans that advocate the closing of roads and trails have no authority to close them without congressional action.

Table C-2
Comments Related to Issues to Be Solved by National Policy

Closing off public land access to all users is not a viable solution. Educating the public through newspapers and other media that there are inexpensive ways to dispose of waste at designated waste management facilities, and advertising free "dump days" are all efforts that could help to curtail illegal dumping on Nevada public land. Funding law enforcement agencies, which are currently task saturated with other priorities, with illegal dumping activity task forces would also help counteract such irresponsible activities.
Another concern I have is the checkerboard pattern of private ownership throughout what appear to be numerous parts of Nevada. I understand the odd ownership pattern may be associated with the railroad. My concern is that fencing of the private land could severely impact access to public lands for all types of users, including BLM staff. This is a tremendous long-term management risk and the BLM should make a concerted effort to purchase private property on key roads to preserve long-term access.
In my opinion, the BLM should not be making more new laws that only discourage use of public land by the public. Rather they should spend their allocated time and money enforcing common sense laws to preserve the land for use by private individuals. Arresting and pressing actions against people that dump their garbage and do other such irresponsible things to OUR land should be the BLM's primary focus. I am NOT for more restrictions!

TABLE C-3

Table C-3
Comments Related to Implementation Actions

In addition, the RMP should ensure that all information regarding the management of the range be considered and evaluated in each Environmental Assessment (EA) undertaken in the management of wild horses and burros. As such, the full disclosure of all predator killing/ management in and around the HMAs should be required in each EA which outlines any management of wild horses and burros. Such predator information could easily be obtained through cooperative agreements with local and national wildlife agencies.

Table C-3
Comments Related to Implementation Actions

In order to ensure transparency and enable the agency to base its management decisions on best possible information during its EA processes, the RMP should mandate that EAs produced by the District and its Field Offices include range monitoring data, including: A listing and description of all horses living within the HMAs; Demographic data on those horses; Documented/observed reproduction rates for the HMAs wild horses; Detailed information on the distribution of horses; Information on movement patterns within the range and outside the range (if applicable); A complete listing of how many mares within the range have been treated with fertility control drugs, what drugs were used and when they were administered; A complete listing of water sources available to wild horses within the HMAs; A full disclosure of all fencing in and around the HMAs; A list of all range improvements, such as water restoration and/or enhancements, both completed in the past five years and planned. By providing the above information the Carson City District and its Field Office will outline possible actions which may be taken to mitigate the need for any wild horse and/or burro removals and the management decisions will be based on data instead of the decades-old practices which have garnered significant public scrutiny.
Lastly, the RMP should require that an EA is prepared for each roundup or management action and should expire within one year. Given that range conditions can significantly alter during the course of one, the agency should not allow an EA to cover actions spanning from six to 10 years or covering multiple actions over extended periods of time. Significant changes often take place on the ground and properly assessing management actions should not be shortchanged for agency convenience.
10. ISSUE: BLM law enforcement officers don't spend enough time on the District; too much time is spent on work off BLM lands. Although BLM law enforcement (LEO) staffing is thin for the CCDO acres needing coverage, excessive amounts of LEO time is spent working off those lands. By choice and request, LEOs are taken to assist on USFS and other federal lands. Part of the issue is the funding source – it's good to grab ATF and Homeland Security funding so that BLM funding can be saved while CCDO LEOs are off District (the American public funds it either way). Saved funds can then be expended on equipment. Using these funds means working wherever the other federal agencies want – away from CCDO. Part of the issue is that it's more exciting to work a project elsewhere that has an objective (especially a neato possible drug bust) rather than patrol remote, lonely areas of CCDO where less glamorous violations are occurring. Part of the issue is that federal law enforcement has been "stovepiped" meaning that local LEO's aren't in the CCDO chain of command. The CCDO District manager can make requests but has no say or control over the time and work schedules of LEOs assigned to the CCDO. Although the CCDO has little to no control over LEO work, it is supplying a full-time office, administrative personnel to do travel, time and other paperwork.
Every year we lose thousands of acres to congested areas which means no hunting or discharge of firearms. I believe some of these areas are needed due to encroachment but many areas are being disturbed and polluted by people with little respect for public lands. We need to keep these areas maintained and patrolled. It is sad as a community that we cannot pick up after ourselves in the field. I think this begins with education and ends in fines.

TABLE C-4

Table C-4
General Comments Related to the RMP

This office of the National Park Service administers the Pony Express and California national historic trails. We ask that the plan consider ways to protect high potential sites and segments, as well as their setting, that occur within the Carson City District.
I know of no person who has gone among the wild ones with half an open mind, to return empty handed.' -Jaime Jackson 1992 Thank you for the opportunity to share with you my ideas about the future of our Carson City District Range Management Plan. I give you these thoughts with all seriousness and am assured you will read them with the same respect and thought.
Scoping Handout - 3.2 Visual Resource Management Beauty is in the eye of the beholder and the Carson City District has a unique visual resource found in few other places in America. There are no non-valuable visual areas within the district. The visual value includes the snow-capped peaks to the flat desert and the oasis-like springs and the juniper and pinyon and sage wild climax species areas and the wildlife including the predator species and the wild horses and burros and sage grouse and tortoise and migratory birds and spiders and snakes and on and on. All natural elements combine to make this CC district visually unique and valuable.
Restoring Ecological Health must be given top priority and if politically unpopular decisions must be made to restore the ecological health, then I urge you to stand firm in these. I urge you to curb those land use designations that have and are causing the most detriment to the public land's ecosystem which include livestock grazing, native predator elimination, unrestrained mining activities, range-damaging off-road vehicle abuse of the public lands, and too much emphasis on promoting game animals at the expense of a more balanced species mix.
I want the BLM to minimize bans and restrictions to only those few cases with a truly compelling need, and I want the BLM to prepare composite maps so citizens can grasp the full and complete impact of all proposals.
I expect you to give better notice as to the time, date and location of all future meetings and comment periods.
Planning/RMP Process The use of predictive modeling has been used as a basis of decision on elements of an Environmental Impact Analysis. It is clear that the use of models is highly dependent on the complexity of the model, "input" parameters, "sensitivity" parameters and the validation/correlation of the results to actual field conditions. We recommend that any use of computer models be validated within the context of this project and location. We are also wary of the practice of "extrapolating conclusions" from models developed and/or used in other districts.
Furthermore, I dont appreciate the verbage on your website about commentary and personal information. It seems more like a threat to me. Threatening me that my entire comment and my personal information will be made public? Seems to me like your trying to dissuade my commentary. Do what you must, I will not be dissuaded from commenting publicly and welcome commentary, public debate and conversation on this matter. "http://www.blm.gov/nv/st/en/info/newsroom/2012/february/blm_carson_city_district.html Comments are welcomed, reviewed, and considered throughout the planning process. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment - including your personal identifying information- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so."

Table C-4
General Comments Related to the RMP

Colleen and Chris, as a former forest supervisor who was always concerns with how to better integrate the public into our projects, I want to send you an early recognition of the fantastic job you have done on the RMP website! The arrangement and more importantly the resources you have made available provide the public with the information needed to submit informed comments. As you know, quite often the general public is at a loss on how to respond to agency requests for comments. I am particularly impressed with your 2-page fact sheets organized by issues and the extensive access to maps you provide. All too often you are beat up for not doing a "good" job, and I wanted to let you know you've hit a home run so far on this project and have set a high bar for the other districts to strive to achieve.
This revision has been open to public review on a VERY limited basis. Public notification of meetings and comment periods has been scant and discussion of the issues involved should have been made public knowledge through radio, TV and newspapers. Information posted on your web site is fractured, not open to public comment or discussion (as a blog would have been) and doesn't directly address the affects the public will face: bans and restrictions to motorized and non-motorized travel, camping, hunting, fishing and shooting.
In summary, I'd very much like to see much more public discussion of the issues, widespread publicity of meeting times and places, clearly stated proposals that specifically address limits to public use in a format that encourages individuals to write their responses in a public format, and a comprehensive and easy to access map that consolidates all of the proposed restrictions.
The wildlife in this district is abundant--pronghorn, sage grouse, birds of prey, lizards, snakes, and other small creatures and needs special attention. Unfortunately, the areas closest to Reno have been overrun by unwise ORV use and used as garbage dumps by those who do not care about the land. This needs to be addressed immediately. On more than one occasion, I have been walking with my dog in the Virginia Range and have had shooters fire very close to me. Since we have a shooting range provided at the base of the range, there is no excuse for this behavior and it needs to be stopped.
I am also concerned about the protection of the archeological values in the district since there seem to be some outlaws who deface petroglyphs and dig out artifacts. There should be close cooperation between the BLM and the Washoe Co. Sheriff's office on these crimes.
You are asking for another Sagebrush Rebellion. Oh yeah, you let all the sagebrush in our beautiful state burn to the ground and now we have an endangered species for you to use as an excuse to take away our land. Here is a good rule of thumb. If it ain't broke don't fix it. Stay out of the land business and stick to putting out fires when they start. That will help us out more than any of your land grabbing laws aimed to keep us from using the land that we love.
Buffer zones can be incorporated around the urban interface areas to reduce conflict.
Thank you for the opportunity to comment during the scoping period for the Resource Management Plan (RMP) revision for the Bureau of Land Management (BLM) Carson City District on behalf of the Cloud Foundation, Front Range Equine Rescue, the Equine Welfare Alliance, and our thousands of supporters throughout the United States. We suggest the following be taken into account when conducting your RMP revision:
Sustainable implies self-sustaining, which requires maintaining a genetically viable population of at least 150-200 adult animals in order to have a minimum genetic effective number of 50 (active and successful breeding adults), according to Gus Cothran, PhD, the most respected equine geneticist in the United States. Dr. Cothran has reviewed the genetics of wild herds for years and, in the case of the Pryor Mountain Wild Horse Herd, for decades.

Table C-4
General Comments Related to the RMP

Conflicts in Urban Areas
We recommend that BLM explore safe and effective methods to mitigate vehicle collisions with wild horses and burros rather than rounding up and removing them.
Streiter-Lites have reduced nighttime deer/auto collisions by 78-90%. The cost is minimal at $10-15 thousand dollars per mile. This includes installation, labor, and parts, and is far cheaper than roundups and subsequent holding. This technology would pay for itself quickly as most collisions would be avoided. Coupled with proper signage along roads where collisions have occurred in the past, accidents could be eliminated in the future. This would have been far cheaper than the "nuisance" roundup of burros in the Bullfrog HMA earlier this year.

Under the Federal Highway Administration's Highway Safety Improvement Programs 90% funding is available, another cost savings to BLM, particularly if local and state government agencies apply for this funding.

Likewise, water guzzling energy projects should not be allowed on HMAs or HAs. In this day and age, it is simply out of the question to allow projects that are water intensive to proceed on water-challenged public lands.

We recommend that if geothermal projects are allowed, it should only be with a legal assurance from the developer that there will be adequate water for all wildlife, including wild horses and burros and that the land will eventually be restored to its pre-development state or in a better state than when development began.

Livestock should be removed immediately if a permittee repeatedly ignores the rules of the permit as has apparently been the case in western Nevada. Bullying the BLM should not be permitted. It goes without saying that a permittee who defies the Agency and knowingly continues to break the terms of his agreement should have his livestock confiscated.

Conclusion
Some BLM decision makers have little knowledge or appreciation of the way wild horse society operates. Unfortunately, these decision-makers may trump their own BLM Field people who often have extensive knowledge about wild horse behavior. Unintended consequences can arise from a lack of understanding of wild equid social organization. Management decisions can actually stimulate reproduction. Excessive disruption of the social order of wild horses due to roundups and removals can result in compensatory reproduction.

Wild horses organize themselves differently than any other hooved animals on the continent and some BLM officials with whom we have spoken have not a clue of these differences, nor a desire to learn what these differences entail. We recommend that BLM staff involved with wild horse management in the Carson City District watch and discuss the Cloud programs, which document the behavior of wild horse families on the Pryor Mountains from 1994 through 2008. We'd also be more than happy to discuss with you our observations regarding wild horse behavior, in person or over the phone.

Thanks so much for considering our recommendations. Please make we are on the mailing list for the rest of this RMP process and for any actions pertaining to wild horses and burros in your district.

The economic realities of a fiscally unsustainable program, which currently stockpiles approximately 50,000 wild horses in government holding facilities at a cost to taxpayers of nearly $50 million annually. Strong public sentiment against wild horse removals and in favor of maintaining wild horses on the range must be a determining factor in how the Carson City District manages the public lands under its jurisdiction.

Table C-4
General Comments Related to the RMP

The EA for the South Steens Wild Horse Gather [http://www.blm.gov/or/districts/burns/plans/files/SSteensGatherEAandFONSIFinal.pdf] (page 41) states, "Skewing the sex ratio of stallions v. mares would result in a destabilization of the band (stallion, mare and foal) structure moving it from five to six animals to three animals. Social band structure will be lost resulting in combative turmoil as surplus stallions attack a band stallion trying to capture his mare. This could result in the foal being either killed or lost. The mare and foal will not be allowed to feed or water naturally as the stallion tries to keep them away from the bachelor bands of stallions, resulting in stress to the mare during her lactation condition."
The World Health Organization has estimated that as of the year 2000, 154,000 deaths and the loss of 5.5 million daily adjusted life years per year worldwide were already attributable to global warming.18 The Scientific Assessment of the Effects of Global Change on the United States devotes an entire chapter on the significant impacts of climate change on human health. The impacts can be characterized as stemming from: temperature effects; extreme events such as storms, wildfires and droughts; climate-sensitive infectious diseases; aeroallergens (pollens); and, reduced air quality.19 17 78 Fed. Reg., 18893-18894, 18901-18902. 18 World Health Organization, 2002. The World Health Report 2002, from http://www.who.int/whr/2002/en/index.html . 19 Scientific Assessment of the Effects of Global Change on the United States, May, 2008. A Report of the Committee on Environment and Natural Resources, National Science and Technology Council, pp. 167-183. Available at: www.climatescience.gov/Library/scientific-assessment/Scientific-AssessmentFINAL.pdf .
Nearly 3,500 citizens have provided to the Carson City District comments supporting that the new RMP increase AML, increase protections and reform management of wild horses and burros under the District's jurisdiction. In fact, over the past year, the BLM has received tens of thousands of letters, emails and telephone calls from American citizens opposed to the mass roundups and removals of wild horses from public lands in the West. Americans have weighed in on the Secretary's proposed strategy for reform of the BLM program, as well as in comments on Environmental Assessments and scoping requests for Resource Management Plans.
The 21 HAs in the planning area constitute a small portion of the public lands within the Carson City District's jurisdiction. On these public lands, current policy authorizes unnaturally small and genetically unsustainable wild horse populations while authorizing livestock grazing at much larger numbers.

Table C-4
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SEX RATIO SKEWING SHOULD BE PROHIBITED The BLM lacks any studies, papers or concrete data relating to the impact to individual horses, bands and/or herds, sex ratio skewing; without the completion of significant scientific studies which outline and understand the implications of sex ratio skewing on the range must be eliminated as an alternative management method. Maintain natural sex ratios; currently there is no empirical data which sets natural sex ratios at 50/50 therefore the negative impact of sex ratio skewing remains unknown. If sex ratio skewing is proposed as part of any alternative, then the EIS and RMP must thoroughly analyze its potential behavioral and social impacts on individual horses, female horses, the herd and environment. Scientific justification for, or analysis of, the impacts on natural herd dynamics must be provided. Other BLM field offices have examined the impacts of sex ratio skewing. For example, the BLM Beatys Butte EA DR FONSI 2009 [http://www.blm.gov/or/districts/lakeview/plans/files/Revised_BButte_EA_FONSI_DR_09012009.pdf] (page 33) states, "If selection criteria leave more studs than mares, band size would be expected to decrease, competition for mares would be expected to increase, recruitment age for reproduction among mares would be expected to decline, and size and number of bachelor bands would be expected to increase. . . ."
On behalf of the 5,500 members of the Toiyabe Chapter of the Sierra Club in Nevada and the eastern Sierra, I am submitting these scoping comments for the revision of the BLM's RMP for the Carson City District. Many of our members live in or near or recreate in the Carson City District and are very supportive of improvements to public land and resource management to achieve conservation objectives.
We pay millions of taxpayer dollars to round-up and pen wild horses in places far away from their stomping grounds. That money should instead be spent by the BLM to restore and improve land and water resources of the public lands.
Please apply these principles to development of a wide range of suitable alternatives related to grazing and biological values in the new RMP EIS that examines all direct, indirect and cumulative adverse impacts of livestock grazing and targeted rehab/restoration actions.
Thank you for taking the time to consider this feedback on Carson City Field Office RMP. The International Mountain Bicycling Association (IMBA) considers the BLM to be at the forefront of managing mountain bicycling on public lands. The BLM is the only agency to have a mountain bicycling specific strategy1 and has been very receptive to trying a variety of partnership concepts to develop progressive trails and management regimes. In order to bring that same level of sophistication to the Carson City RMP we ask that the BLM engage in landscape scale trail planning.
An example of the model is Fruita, Colorado and Moab, Utah. Both cities host extensive stacked loop trails and trail systems and serve as riding Hubs connected by the Kokopelli Trail. While this example is huge in scale, a proportionate system could also serve the Carson City Field Office and the surrounding area. A Hub is an area in the front or side country that is relatively easy to access. The area features a higher trail density with a stacked loop system that could offer beginner, intermediate and/or expert trails, as dictated by the management needs of the area and the landscape. A Hub could also include hiking only trails, and trails that provide access to other recreation resources such as rock climbing sites or river access points. The Spoke trails are connections between Hub areas and other destinations such as home, community amenities, other developed recreation sites and into the backcountry. Ensuring that the areas are interconnected creates benefits such as allowing trails to be used for transportation as well as recreation. This also allows recreational riding to begin from home, eliminating the need to drive to the trailhead and adding value to local properties.
It is my request and desire, along with thousands of other Americans, that the revised Resource Management Plan at this critical time must focus on restoring the management of wild horses and burros on their entitled public land as a prioritized use.

Table C-4
General Comments Related to the RMP

The lands in Nevada are for public use. Let's leave it the way it is. I don't hear a lot of people complaining about others using public land. Public lands are for the Public. If you want to put this issue on a ballot at your expense and have the Public vote on it, that's fine. Otherwise stop trying to justify your job and leave things alone. Your services will not be needed if you proceed with this.
I am responding to BLM's request for input regarding the Resource Management Plan (RMP) Revision that is currently in its planning stage. My comments pertain principally to wild horses and burros. However, other topics necessarily must be addressed as well. Here are my recommendations for the principles on which Carson City District Office (CCDO) should approach management of its mustangs.
Conclusion I urge CCDO to consider the recommendations provided herein and to incorporate them into the RMP Revision. Finally, I urge CCDO to limit the RMP Revision to, at most, five years. RMPs that last 20 or more years cannot be flexible and dynamic, as you would like yours to be. Would you please respond to these substantive comments. Thank you.
I am not happy at all with how you are handling this RMP process. Your meetings need to be made more visible for the average 9-5 worker, like myself. Even if I had received notice of one of your meetings, I would not have been able to attend because of their midday scheduling. I ask that you make all public meetings much more publicized and at times that working citizens, like myself, can attend. I want the BLM restrictions and bans to relate only to those cases that are TRULY in need of these restrictions.
I am also asking that the BLM prepare composite maps so we can truly grasp the full impact of your restrictions.
Unfortunately I just learned of the Carson City RMP revision yesterday so I am sure that I am missing other points that are important to me and my family.
Following are my comments in connection to mostly ATVing with minor association to snowmobiling. Note that I have been an avid snowmobiler since January 2000 and ATVing since March 2010. I snowmobile in Nevada, California, Idaho and Utah. I have gone on ATV rides in Nevada, California, Idaho, Oregon and Utah.
Following are my comments directed to development of the revised BLM CCD Resource Management Plan that will take approximately 4 years to complete. All comments are in associated with OHV activity in the BLM CCD management area of approximately 5 million acres.
Land management planning affords the BLM the opportunity to step back and identify and analyze what has changed since the current RMP was completed in 2001, and to work with the public to identify what changes are needed to address today's and tomorrow's challenges and opportunities. Such an opportunity cannot be left to pass without giving it a concentrated and comprehensive effort. It is in this spirit that we offer the following comments.
1. THE RMP/EIS Must Meet the Requirements of the National Environmental Policy Act ("NEPA") NEPA requires federal agencies to prepare a detailed EIS for "all major actions significantly affecting the quality of the human environment." 42 U.S.C. § 4332(2)(C), "NEPA 'ensures that the agency . . . will have available and will carefully consider detailed information concerning significant environmental impacts; it also guarantees that the relevant information will be made available to the larger [public] audience."

Table C-4
General Comments Related to the RMP

BLM must apply a legal definition of "road" within the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and in fact, close and reclaim such "ghost roads." Some legal roads serve important travel needs and are appropriate for motorized use. However, routes that are not "roads" should not receive equal consideration. The agency has a definition of "road," and this definition should be adopted and used consistently in order to create a regular expectation and approach on BLM public lands. We note however, that merely meeting the definition of a road is not sufficient to justify designating a route. In fact, the BLM must still consider whether a route has negative impacts to sensitive or protected resources, such as by the process recommended in this document, and should only designate those that do not impact these resources.

The legal definition of road for the BLM public lands is derived from the definition of "roadless" in the legislative history of FLPMA:
The word "roadless" refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road. (H.R. Rep. No. 94-1163 at 17 (1976)).

The BLM must also ensure compliance with the minimization standards found in 43 CFR §8342.1. These regulations require the authorizing officer to designate ORV routes in accordance with minimization criteria which state:

"(a) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.
(b) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
(c) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.
(d) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established."

In the ruling for the case Center for Biological Diversity, et. al. v. U.S. Bureau of Land Management, et. al. (C 06-4884 SI, filed 9/28/2009) the court found that not only did the BLM have to abide by the minimization criteria, but also must document how it does so specifically for the designations being considered. The use of tools, such as decision trees, is not sufficient unless they specifically address the criteria.5 The court also found that the BLM must show a "rational connection" between the facts considered and decisions made.6

In this same decision the court elaborated on the meaning of the word "minimize" in the regulation, clarifying that it refers to the "effects" of the route designations, such that the BLM is required to place routes specifically to minimize ‘damage’ to public resources, ‘harassment’ and ‘disruption’ of wildlife and their habitat, and minimize ‘conflicts’ of uses.7

5 Opinion, pages 19-30.
6 Ibid, page 31.
7 Ibid, page 30.

Table C-4
General Comments Related to the RMP

8. The RMP EIS Must ADEQUATELY ANALYZE AND DISCLOSE THE IMPACTS OF THE PROPOSAL WITH REGARDS TO CLIMATE CHANGE
The warming of our climate system is unequivocal.10 11 12 There have been significant increases in global average air and ocean temperatures, widespread melting of snow and ice, and rising global average sea level. Eleven of the past twelve years rank among the warmest in the instrumental record of global surface temperature, and it is likely that average temperatures in the Northern Hemisphere have been the highest in at least the past 1,300 years. Satellite data since 1978 show that Arctic sea ice is shrinking at a rate of 2.1-3.3% per decade, with even larger declines in summer sea ice.13 The National Snow and Ice Data Center ("NSIDC") reports that in 2006, Arctic ice had diminished to its all time lowest recorded level. They further report that sea ice extent averaged over the month of March 2009 was 5.85 million square miles. This was 282,000 square miles above the record low of 2006, but 228,000 square miles below the 1979 to 2000 average. Air temperatures over the Arctic Ocean were an average of 1.8 to 3.6 degrees Fahrenheit above normal, and sea ice older than two-years reached record lows.14 15 In April 2009, the Wilkins Ice Shelf destabilized and collapsed, leading researchers to state that, "There is little doubt that these changes are the result of atmospheric warming on the Antarctic Peninsula, which had been the most rapid in the Southern Hemisphere".16

10 Climate Change 2007: Synthesis Report – Summary for Policymakers, International Panel on Climate Change, page 2.
11 Technical Report Document for Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act. Climate Change Division, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C. April 17, 2009, page ES-2.
12 Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 2023(a) of the Clean Air Act; Proposed Rule. 78 Fed. Reg., 18896 (April 24, 2009).
13 Climate Change 2007, page 2.
14 Arctic sea ice younger, thinner as melt season begins, April 6, 2009, from http://www.nsidc.org/arcticseaicenews/ (last accessed April 30, 2009).
15 J. Richter-Menge et al, 2008. Arctic Report Card 2008, Sea Ice, from http://www.arctic.noaa.gov/reportcard/seaice.html (last accessed April 30, 2009).
16 European Space Agency, April 29, 2009. Satellite imagery shows fragile Wilkins Ice Shelf destabilized. Science Daily. Retrieved April 30, 2009, from http://www.sciencedaily.com/releases/2009/04/090428154833.htm .

The inescapable fact is that global warming and climate change now presents a dire situation for life on Earth, and as a major emitter of GHGs, the United States must act quickly and deliberately, using any and all the tools at its disposal to eliminate or reduce the dangers to human health and the environment.

In its Endangerment and Cause or Contribute Findings, the EPA has explicitly acknowledged that climate change resulting from elevated GHG levels would result in human health risks such as heat-related mortality, exacerbated air quality, aggravated risks for respiratory infection, aggravation of asthma, and potential premature death for people in susceptible groups.17

The impacts to species and biological diversity are likewise severe. In a study published in Nature in 2003, Parmesan and Yohe reported a "globally coherent fingerprint of climate change impacts across natural systems." 20 In documenting this "fingerprint" of global warming on ecosystems, scientists have predicted three categories of measurable impacts from recent warming: (1) earlier timing of spring events and later autumn events (i.e., changes in "phenology"), (2) extension of species' range poleward or upward in elevation, and (3) a decline in species adapted to cold temperatures and an increase in species adapted to warm temperatures. 21 Of local concern, are impacts to the sage grouse, desert fish, and low elevation plants or plants with narrow environmental constraints.

20 Parmesan, C. and G. Yohe. 2003. A Globally Coherent Fingerprint of Climate Change Impacts Across natural Systems. Nature 421:37-42.
21 Parmesan, C. and G. Hector. 2004. Observed Impacts of Global Climate Change in the U.S. Prepared for the Pew Center on Global Climate Change.

Table C-4
General Comments Related to the RMP

Impacts of global warming have been predicted with a high degree of both certainty and precision, providing the BLM with more than adequate information to analyze and disclose the carbon footprint of the proposed action and its contribution to global warming and the likely impacts on resources including air quality, water availability, and to imperiled plants and animals.

In a Ninth Circuit case, Center for Biological Diversity v. National Highway Traffic Safety Administration, 508 F.3d 508, 555 (9th Cir. 2007), involving an NHTSA rule for corporate average fuel economy standards for light trucks, the court found that climate change satisfied several of the "intensity" factors in 40 C.F.R. § 5108.27(b). First, the court found that although the NHTSA rule at issue may have an "individually insignificant" effect on climate change, it may nonetheless have a "cumulatively significant" impact, thereby satisfying 40 C.F.R. § 1508.27(b)(7). In addition, the court found that climate change will affect public health and safety, satisfying 40 C.F.R. § 1508.27(b)(2).

Table C-4
General Comments Related to the RMP

Several recent reports 22, from high ranking U.S. science groups made the following factual findings regarding the social and environmental impacts resulting from increased GHG emissions and climate change:

• "[A] severe drought has affected the southwestern United States from 1999 through 2009";
• "Human-induced climate change appears to be well underway in the Southwest." (Includes California and Nevada;
• "The annual peak of streamflow in snowmelt-dominated western mountains is now generally occurring at least a week earlier than in the middle of the 20th century. Winter stream flow is increasing in basins with seasonal snow cover. The fraction of annual precipitation falling as rain (rather than snow) increased in the last half century";
• "Most climate models project an increase in winter precipitation in the northern tier of states and a decrease in portions of the Southwest during the 21st century";
• "The snow-covered area of North America increased in the November to January season from 1915 to 2004 due to increases in precipitation. However, spring snow cover in mountainous regions of the western United States generally decreased during the latter half of the 20th century. The IPCC determined that this latter trend is very likely due to long-term warming...";
• "In the last three decades, the wildfire season in the western United States has lengthened and burn durations have increased. Climate change has also very likely increased the size "associated decrements to air quality and pulmonary effects, are likely to increase in frequency, severity, distribution, and duration in the Southeast, the Intermountain West and the West";
• "The forested area burned in the western United States from 1987 to 2003 is 6.7 times the area burned from 1970 to 1986 (Westerling et al., 2006)";
•"Wildfires pose significant direct health threats. They can also have substantial effects through- increased eye and respiratory illnesses due to fire-related air pollution and mental health impacts from evacuations, lost property, and damage to resources" and "associated decrements to air quality and pulmonary effects, are likely to increase in frequency, severity, distribution, and duration in the Southeast, the Intermountain West and the West"; • "Conditions observed in recent years can serve as indicators for future change. For example, temperature increases have made the current drought in the region (Southwest) more severe than the natural droughts of the last several centuries. As a result, about 4,600 square miles of pinon-juniper woodland in the Four Corners region of the Southwest have experienced substantial die-off of pinon pine trees".
• "Another example of the ecological consequences of climate change involving Insects and affecting adaptability is the devastation of millions of acres of western U.S. and Canadian pines by bark beetles during the warmth and drought of 2000 to 2004. Recent modeling and observations revealed that beetles invading the northernmost lodgepole pine trees are now only a few miles from previously pristine jack pine populations (Logan and Powell, 2007). This may create a direct pathway of invasion to valued pine forests in the eastern United States and Canada";
• "Climate-fire dynamics will also be affected by changes in distribution of Ecosystems across the Southwest. Increasing temperatures and shifting precipitation patterns will drive declines in high-elevation ecosystems such as alpine forests and tundra. Under high emissions scenarios, high-elevation forests in California, are projected to decline by 60 to 90 percent before the end of the century";
• "In California, two-thirds of the more than 5,500 native plant species are projected to experience range reductions up to 80 percent before the end of this century under current projected warming";
• "As the climate warms, stream temperatures are likely to increase, with effects on Aquatic ecosystems. There is some evidence that temp

I want to thank Christopher McAlear, Alan Bittner and Dan Westermeyer for taking the time to meet the Pine Nut Mountains Trails Association and the Nevada Trail Stewards to answer questions about the Resource Management Planning process. These additional meetings, in addition to the Open Houses, helped provide insight on the process and helped us drill into the details of a successful travel management plan.

Table C-4
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A high percentage of Nevadans own OHVs or horses. This is seen in the number of local businesses catering to equestrian or OHV enthusiasts and by the number of number of local clubs. A partial list of local clubs and enthusiasts groups includes:

i. Western States Racing Association
j. Motorcycle Racing Association of Northern Nevada
k. Valley Off Road Racing Association
l. Lassen MC
m. Tank Slappers MC
n. Trailblazers MC
o. Rim Benders MC
p. Dust Devils MC
q. High Sierra MC
r. Hills Angels 4x4
s. Reno 4x4 Club
t. Sierra Stompers 4x4
u. Pine Nut Mountains Trails Association
v. Coalition for Public Access
w. Alta Alpina Bicycle Club
x. Reno Wheelmen Bicycle Club
y. Back Country Horseman
z. Washoe County Mounted Posse
aa. Douglas County Mounted Posse
ab. Western Nevada Horseman's Association

CLOSING
We appreciate the chance to provide our thoughts on what the RMP needs to consider. This letter represents the input of the Pine Nut Mountains Trails Association, an organization that speaks for its 80 members. We have stepped up to the plate by partnering with the Great Basin Institute and the BLM Carson District to establish a system of trail heads and backbone routes in the Pine Nut Mountains Management area. We believe this is a model that has been demonstrated to work.

Send all the unwanted horses and burros to Madelaine Pickens' eco-sanctuary. She knows the proper way to treat animals.

I am a U K resident who visited Nevada last year I visited some of the herd areas just to see the wild horses & burros. I have read articles in the press about your ideas on the new (RMP). I would ask you to demand a change for the horses and burros in the heart of mustang country, our world is changing by the hour, please think about my comments.

I follow our local wild horse bands, documenting them in my photographs to share with the world. They are Nevada's true treasure and should be given priority in range management planning.

Table C-4
General Comments Related to the RMP

Despite the Washoe County Sheriffs Department saying that they can afford to go over to the range, I am not given a company car in which to indulge my hobbies. I have not been given gas to fuel my company car so that I can indulge my hobby and I will not in the future be given either to endure the trek down to Carson in order to utilize a range being run with a wide variety of skill levels and safety measures (Meaning I will not subject myself to being potentially getting shot when an idiot sweeps the range).
I do not litter on BLM Land. I consistently clean up empty brass and scrap glass and lead when I use the lands. I know I speak for others who act and use the area responsibly that we will continue to do so. So please keep the land open for all recreational uses, Shooting Included.
Only recently did I become aware of the Bureau of Land Management plans to revise the Resource Management Plan for the Carson City District. I understand that you are still in the Scoping Stage of the process and are still inviting public comment on what issues we believe should be addressed in the plan.
I see we had some secret meetings or meetings that were very poorly advertised. To use such to change land management to your advantage is wrong and unfair. We moved to BLM adjacent land to use such for recreation which includes riding, hunting and shooting. As a disabled veteran I use a quad to get out on the land which I enjoy very much. Without a quad or side by side I am and will be unable to enjoy what I enjoy doing and what my family purchased this land and house for. It is unfair for you to take away the use of the land that I fought for in my service time, as without a means of transportation I will have no access.
It is unfair for you to use meetings that are not openly published in places other than a small time paper in the back where so many forclosures and so few people read or have access to. I would suggest meetings be advertised on the radio and by mailings as so many other politicians trying to save their jobs use.
Please stop taking our rights to own, carry, hunt, and shoot our legally owned firearms protected by the Constitution of these United States of America on Federally owned (Citizen Owned) lands!
There has been a systematic dismantling of multi-use purposes of lands owned in trust by the Federal Government that are in essence land owned by United States Citizens. It is not a cheap grazing range for The Cattlemen's Association.
We also note the round-up and removal of our great American families of wild horses and burro's. We used to be able to go out into these wilderness areas and see dozens of bands of Wild Mustangs and Burro's. Now, if we are lucky, we might see an old stag that is too lame to run from us.
Dear folks of the BLM. Keep our lands open to hunting and shooting. Remember you work for us.
The Bureau of Land Management is a member of the Federal Lands Hunting and Shooting Sports Roundtable. This national group was created by a memorandum of understanding signed by three federal agencies (including the BLM) and 40- non-governmental organizations to address issues and opportunities associated with hunting and recreational shooting on public lands and national forests. Materials developed from this roundtable should be incorporated into your proposal.
Recreational shooting (target shooting) is one of many activities that the Bureau of Land Management (BLM) may allow on public lands as part of its discretion to manage for multiple uses. In accordance with the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM typically manages a wide range of multiple use activities on most public lands provided that they that do not impair the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, and archaeological values, and that they do not endanger human health, safety, or property.
This is assinine! This state is largley populated by hunters, fishers, and outdoor enthusiasts and without access to to the trails, shooting areas and other portions of the state it will restrict everyone to main routes depriving individuals of OUR right to enjoy this bountiful land. By doing this it will make the many beautiful features of this state dormant. This should be stopped immediatly!
The land and its resources in the scope of the management plan are vital to the public. The management, health and productivity of these lands and resources are critical, and the Burea of Land Management has been trusted with the authority to ensure it is done. This comment is to adjure the BLM to uphold its duty to manage the resources in a responsible way that ensures they are available for the use of the public now and in the future.

Table C-4
General Comments Related to the RMP

Resources make hands-on education possible I teach at a private, non-institutional school based in the Carson Valley area of Nevada. Some of the programs and areas of study in our school include the use of resources in the area affected by the management plan. The land and resources are vital to our students' education and our school's curriculum in science. Specifically, within the nearby Pinenut Mountain area, our students are participating in activities of stream-following, learning to understand the water cycle and about erosion. We're studying topics in geology and geomorphology ranging from the forms of sedimentary rock and alluvial depsosits to volcanism, plate tectonics, geological time, and the orogeny of the Basin and Range and Sierra Nevada batholiths including the Pinenut mountains and the resulting metamorphism of sedimentary and igneous rocks. The resources available in the management area make possible research and learning in such a broad range of topics from lichens and pedogensis, soil sciences, and erosion, to wildlife, ornithology, the study of the area's diverse raptor, rodent and reptile populations, and even the archaeological remnants of Nevada's recent history through the 19th and 20th centuries. Besides this, in the last year our students participated in birding activities and the Audubon Society's annual Christmas bird count in the Ruhenstroth and Fish Springs areas. We also hosted several star parties with evenings of observations and discussion of astronomy from dark sites within the Ruhenstroth and Pine Nut mountains areas as well as in other nearby public lands in the Toiyabe National Forest. We conduct frequent field days and numerous overnight field trips throughout the year. The habitat and sites within the managed area are important to ongoing activities and those planned for future dates.
Conservation critical, as well as access. The conservation of each of these resources is critical to scientists, educators, parents and our children. Without the proper respect, concern and due diligence, this area will degenerate to a wasteland shaped primarily by the negligence and carelessness of the ignorant and reckless few. While the preservation of these vital resources is of grave concern to us, it would be of little use were they preserved by the exclusion of any benefit to mankind. Maintaining access to the benefits these resources provide is of the utmost concern to us.
High-quality in decision-making withstands single-minded efforts to overthrow interdisciplinary planning. Because the widespread access that is vital to scientific and educational purposes has the potential to impact resources that other interests may believe are best preserved by exclusion, we are convinced it is critical that access is maintained not merely by status quo but by a vigorous examination that thoroughly considers the consequences and ramifications from the perspective of all the values included in an interdisciplinary approach. It has been demonstrated that quality in decision-making with regard to the management of such resources is important to ensure the decisions withstand judicial scrutiny should single-minded interest groups attempt to effect low quality decisions by such authority. Shortcomings in the management planning process whereby the significance of a resource-user/concern is overlooked or not given fair consideration can lead to a judicial process that results in low-quality decision-making as judicial mandates in favor of single-minded plaintiff/advocates effectively replace systematic and interdisciplinary planning. Please make use of the Resource Management Plan revision process to bring the District's resource management to a level of excellence by ensuring that responsible planning is backed by high quality in decision-making.
As a young man, I had few opportunities to gain experience with firearms in my hometown in California, mostly because of a lack of places to practice my gun handling skills. It was only on my summer vacations visiting relatives in your district that I was able to learn gun safety and amateur marksmanship. These learning experiences took place on BLM lands where the low density of people and varied topography made for very safe and enjoyable shooting experiences. The western Nevada BLM lands in your district offer many areas that can be accessed and safely used for responsible amateur marksmanship. People such as myself enjoy the opportunity to visit your district's lands and make use of the fact that recreational shooting can easily be enjoyed at various undeveloped sites that are suitable for such purposes. This is an attraction that few areas in America have to offer, and sportsmen like myself make it a point to visit these lands in order to enjoy the sport of amateur marksmanship in a safe environment.

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I would like to make a comment regarding the BLM Carson District Resource Management Plan, but I am unable to open https://www.blm.gov/epl-frontoffice/projects/lup/22652/33752/35002/CCDO_Scoping_Comment_Form_fillable.pdf and mailto:BLM_NV_CCDO_RMP@blm.gov%20?subject=Attn%3A%20Carson%20City%20RMP. I realize the deadline for making public comments is today. Could you hold the comment period open later due to this glich on your part? I, my family, and friends spend a great deal of time utilizing the public lands in northern Nevada and have a great deal of interest in any proposed changes to the Resourse Management Plan.
As hunters, fisherman, campers, and naturalists, we are interested in access to all of our activities that we have enjoyed on our public lands for generations. The management of our public lands should not be guided by political and idiological policy, but rather by considerations that the residents most intimate with the areas in question should carry the most weight.
I am a 54 year old retired building contractor and have recently moved to Gardnerville from Sonoma County, California because I did not like the change that took over the area. I am an avid outdoorsman and have bow hunted throughout Northern Nevada for many years. I live between Pine Nut Road and Fish Springs Road off of East Valley Road and currently enjoy being able to do most the same things I could when I was younger. I have become very familiar with the roads and trails including the single tracks in the Pine Nut Mountains. My use for the area includes: ATV 4 wheelers, dirt bike/motocross, mountain biking, hiking, camping, and metal detecting. I have 48 years' experience in motocross/trail riding and have competed in mountain biking competition. Following is a list of my issues and concerns for the Pine Nut Mountain area including what I would like to see done.
8) BLM involvement should include Alti-Alpina bicycle club, local bicycle and motorcycle shops, 4 wheeler clubs, hiking clubs, horse riding clubs, and local newspaper regarding calendared events, improvements, work parties, and getting the news out. More awareness will get more people involved in the enjoyment of what we have in our backyard! Also, more local police/BLM involvement regarding littering, squatters, suspicious activities, etc. (yes, I have seen some suspicious activities back in those hills). A hot line phone number on all sign postings would be a suggestion.
In summary, for over 3 years now, my wife, sons, daughters, visiting friends, my dog, and I have enjoyed my backyard called the Pine Nut Mountains and what they have to offer. I very seldom run across other people on my ventures but if I do I know they are there for the same reason I am, to enjoy. If you have any questions, comments, or need help, please email or call me at 707-495-5074.
As a supporter of wild horses, I'd like to take this opportunity to offer my appreciation to the CCD in encouraging community involvement and interaction in decisions and policies; for being available in communications, either by telephone or email, and unfailing courtesy in those communications; and finally, for the attention to detail in Environmental Assessments involving wild horse removals. Not necessarily for 'purpose and need', but for the recognition given the horses themselves in the EAs. There is no recrimination nor blame leveled at the animals. There are facts presented. And this attention goes beyond the gathers, demonstrated by agents who follow-up and follow-through once the animals have been removed. This office may not always get positive recognition, but it's efforts are still appreciated.
First some personal history of my own: I am a retired peace officer with over 34 years of experience with a rather large sheriff's department in California. I am now a resident of northern Nevada and have been for the last several years. One of my primary reasons for moving to Nevada was that it was a firearm friendly state. I also appreciated the abundance of federal land which is open to public use. I am a user of said lands and have been for most of my life. I have passed on that characteristic to my children and grand children. We all enjoy the open outdoors of the western United States.

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I believe that most everyone who accesses public lands for recreational purposes does so with their own interests in mind. Sometimes, I think, certain groups/people forget about others who also recreate on public lands but not for the same reasons. Personally speaking, my family and I utilize public lands for three main reasons: 1. A place to legally hunt, 2. A place to legally and safely shoot our firearms, 3. A place to fish. Obviously, we hike and camp. Hiking and camping fit in to the experience of at least two of our uses.
To the point of this letter, please keep hunting and target shooting as a primary factor in developing the Carson City District RMP. Both are time honored traditions in America and I feel that they should remain so. I have a lot more to say on this topic, but I'll stop for now.
Please address hunting and recreational shooting in a positive manner in the Carson City RMP, and, to the maximum extent possible, please keep public lands open for hunting, offroad recreational use allowed, and recreational shooting encouraged.
....monitoring data was meeting management objectives.... In other words, the whole fiasco (winter gather, miscarriages, foals sloughing hooves, high death count) was unnecessary. The range wasn't suffering, and the horses were in good condition. They should have been left alone. Adding to poor public opinion of this gather were comments like this: "A goal of the roundup, acknowledged Heather Emmons, a spokeswoman for the agency, was providing access to grazing land for cattle." (New York Times) Third - BLM needs to adjust its view about what exactly it is managing. Horses are PRINCIPAL users of their land yet they always seem to be considered last - "troublesome, an inconvenience, a pain in the neck" - instead of "the reason many of the BLM staff have jobs". Lastly - BLM frontline staff needs to know that wild horses don't just survive, they thrive on poor forage. As hindgut / cecal digesters, they are made for the desert habitat. Staff members should not be viewing these horses and burros through the lens of domestication- there's no need to feel sorry for them as they eat brush instead of alfalfa (as was mentioned to me at a recent gather) - their low quality diet encourages wandering and grazing, vs standing in one lush spot gorging on green grass.
What age structure and sex ratios are appropriate to ensure healthy future herds of wild horses and burros? The best age and sex ratios are those designed by nature. Skewing the M /F ratio is useless, since technically only 1 stud is needed to keep a large number of mares in foal. Altering age and sex (by taking babies and returning a higher percentage of males) changes herd dynamics, robs them of their collective knowledge (elder "wisdom" and so on) and adds more stress to animals already being closed in on from all sides. The whole reason they are as strong and hearty as they are is through natural survival of the fittest. Rotating birth control "catch and release" programs might be a good compromise between gathers and no management. At least the herds stay together and maintain their social relationships, even if they're "baby free" for a couple / few years.

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Any other issues or concerns with the management of wild horses or burros? There's a lot of water under the bridge, in terms of bad feelings between "the public" and BLM / Wild Horse staff, and unfortunately many interactions are now strained. The perception of secrecy and deception is a big black eye for the agency. It seems to be a combination of stubbornness, lack of communication from frontline staff with "boots on the ground" and policy makers, lack of current science, and the perception of BLM being "in bed with the cattle lobby" when it comes to horse issues. The makeup of new citizen panel is a timely example. Regardless of who is at "fault" in the troubled communications that now exist (public or BLM) it's BLM's paid job to fix it, and handle whatever issues arise related to management of the horses. Collaboration would go a lot farther than the current model of confrontation and damage control. (Example: how can the public trust that the BLM is trying to change when the citizen panel doesn't accurately represent the citizens...)
Myself & my family support all forms of recreational and special event use of public lands in the spirit of "multiple use" for the benefit of our citizens who own them. The multiple use mandate requires that OHV travel, grazing, mining & infrastructure improvements continue to be "prescribed uses" of public lands
Amenities like toilets, loading ramps, dry camping & developed camping areas should be built. A system of routes that connect the individual "special recreation areas" of the Pine nuts, Wilson Canyon, Smith Valley, Desert Creek, Middlegate, Sand Mountain, Moonrocks, Fort Sage, Black Rock, Nightengale that would inter connect them to encourage travel throughout the state.
The Canoe Hill Trail Association (CHTA) is an informal group of trail users that first approached the BLM in 2007 regarding an existing "social trail" that exists on approximately 1920 acres of BLM lands (T20N, R21E- Sections 19, 30, and 31) managed the by Carson District Office. These BLM lands are in the Southwest region of Pah Rah Mountain Range within the City of Sparks, Washoe County, Nevada. The Washoe Paiute Tribes have reservations in the general region and includes all or portions of the Pah Rah Range as part of their ancestral homelands. Individuals from these communities and tribes utilize outlying portions of the mountains for a wide variety of commercial, recreational, subsistence, cultural and religious activities.
The Pah Rah Range is located in Western Nevada, east of the Sierra Nevada Mountains toward the central- eastern boarder of Washoe County. The Pah Rah Range is bounded by the High Basin/Dry Lake Beds Petroglyph, an Area of Critical Environmental Concern (ACEC) to the immediate east and northeast, and then Spanish Springs Peak and the Pyramid Lake Reservations to the far east and northeast; the Truckee River and then the Virginia Range to the south, and the Spanish Springs Valley to the west. The Spanish Springs community and Cities of Sparks and Reno are located in the valley to the north, west and south of the Pah Rah Range (also referred to as the greater Truckee Meadows). Specifically, these comments concern the usage of BLM lands at T20N, R21E- sections 19, 30, and 31, which are separated from the High Basin/Dry Lake Beds to the west and southwest by Spanish Springs Canyon.
The general outdoor experience of Nevada should not be altered to appease some "green" group that does not live here and never ventures into our state. We love our Nevada lifestyle and will work to keep it as close to the same as it is today for future generations to come. Please note that the off-road community has put in more volunteer hours and dedication to conversation and clean up than all "environmentalist" groups combined. We are the ones who love the outdoors, we are the ones fighting to protect it and protect it for all to enjoy. Thanks for your time with this important matter and best regards,

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General statement: The RMP process has the APPEARANCE of LISTENING and taking seriously the public's concerns. In REALITY it is only an "appearance", as mentioned in Fallon's meeting, and decisions, though popular, are made by governmental agencies in terms of what they were intending to accomplish prior. This is a waste of taxpayer money on several levels and DISENGENUIOUS and cannot be hidden from the public's observations and why it was "hot topic". We live in a country being run by BUREAUCRATS that are more and more ignoring the law and regulations, which were intended to limit the powers of government. Elected officials are ignored due to their term limits, but the bureaucrat is in office for years. This has worked to the detriment of the west's public lands policy and the multiple use concept.
I'm writing to comment on the Carson City District Office RMP revision. I live and recreate in Northern Nevada, on foot, by 4WD and motorcycle. Below are my points and comments regarding the RMP revision.
3) Overall, the BLM has/is implemented far to many regs for the public lands. It is getting to the point that the lands are not really for the public to enjoy without worrying about breaking some rule. The regs need to be thinned down (simplified) to realistic ones that really are needed to protect the public lands from abuses.
4) Maintain the public lands for the public to enjoy.
6) Stewardship Contracting. The CCDO had opportunities to implement stewardship contracts on the ranches that have been acquired (For example: Washoe Valley and in Carson along Carson River) however, failed to do so. These ranches could have been excellent examples of stewardship contracting for the CCDO and the BLM as a whole. Trading the goods (grazing the grass) in exchange for services (such as fence repair, irrigation, ect) could have lead to showcases for the BLM. I would suggest that those be a priority in this planning process.
My husband and I are raising our granddaughter. Our family often vacations by taking All Terrain Vehicle (ATV) trips to various locations. It is how our family spends time together, and allows all of us to visit remote places otherwise inaccessible to us.
We plan on visiting Nevada, and when we do, we look forward to spending much of that time riding. Please don't take this family opportunity away from us.
My name is Tom Taflin and I write my comments because I moved here because of the amazing recreation opportunities we have around here. I have been recreating in Douglas County since 1996 while living in South Lake Tahoe. Everybody in South Lake Tahoe comes down here to enjoy the Pine Nuts. In addition to the Pine Nuts, I love to take my family and friends to Sand Mountain and the Black Rock Desert. I finally left Lake Tahoe to be closer to the Pine Nuts in 2006 and bought a home in the Johnson Lane area. I am a member of the Pine Nut Mountain Trail Association and the Toyota Landcruiser Association. OHV recreation is very important to me and my family and all my friends. OHV recreation is a very important asset to Douglas County.
There was never any need for the masacre of the mustangs, politician, cattlemen, all found that paying for what they wanted, grazing rights for their cows, a leg up in a political career, whatever the excuse or justification for their murder , it is still that: an excuse.
I began to write a screenplay a few months ago with the help of a producer who did THE BLACK STALLION, about the wild mustangs in Nevada. Everything you mess up in public gives me more story. I have been disgusted and disillusioned over and over again to find the abuses of the BLM in books, in photos, in court cases. Never ending load of crap. I talked with Steve Spielbergs publicist after WARHORSE came out and connected him with Madeleine Pickens to see if he would be able to bring more of this to light in a way that is mutally beneficial. He agreed. He is reading and watching all the infromation she could send him about what is happening to the horses.

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I have American Indian in my gene pool and was allowed to go to an Indian School in my last year of highshcool, where I learned how the history books had whitewashed the real stories about what happened to Indians. They pushed them on to land they couldn't survive on and then let them die off. Same thing that is happening to the wild horses. Push them on to land they can't live on and then call in your expert veterinarians to say it is the humane thing to do to kill them. Crock. When did the BLM ever care about the welfare of the health of a horse? Just a dead one. That is the aim of the group, there are too many photographs out there of the neglect they suffere once in the pens to argue about that.
I went to a horse show and asked people there from other states what they thought the solution should be. Most were confused as to why the horses had to be rounded up. Why? That's right. They don't. Let them be freee, leave them alone. My idea is to at least get them out of the pens. There are plenty of people with large tracks of land that could take in a small herd and allow it to run free on their property in exchange for a small tax deduction. That would work. let the mare be given the birth control and let them roam on private property with a contract for their care.
Take all that money that the BLM gets every year to "manage" them...and instigate their care out in the wild. You say they are starving buy some food and water and give your employees the job of feeding them where they find them rather than rounding them up and letting them rot in a cage. The big question that I would like answered is why is it that every time in any country by the way, that a government is given the job of animal welfare, their answer if to kill everyone? Too nazi for me, Why not save them instead of kill them? It is better for everyone to give up the round up. Makes you look bad, in every way. The BLM has a lot of tap dancing to do to get the public to think that anything they do is not a cover for who really wants them to do away with the horses. The cattle people. The rich land owners, who make the burgers.
Also, when BLM is reseeding, is BLM using genetically engineered seeds or trees? There are too many unknown effects to the environment to justify using genetically engineered seed or trees.
Which HMAs are suitable for the long-term management of wild horses and burros? ALL OF THEM. These were designated primarily for the use of wild horses. BLM is in violation of FLPMA when it favors uses that make money (which BLM obviously does).
Where are habitat improvement projects appropriate? What kinds of improvement projects are feasible? Drill some wells or pipe in some water for sources of water for the wild horses. The logistics are easier than planning a roundup, and it would be cheaper than roundups.
Any other issues or concerns with the management of wild horses or burros? Yes. The BLM does not have an accurate count of the wild horses. Do you have any aerial photographs or video of bands from pre-inventory flights? The BLM can only legally remove horses if there is an EXCESS, and the BLM cannot prove that there is an excess. BLM uses flawed "guess-timates."
BlueRibbon Coalition members use motorized and non-motorized means, including Off-Highway Vehicles (OHV), snowmobiles, equestrian, mountain bikes, and hiking to access and enjoy recreating upon state and federally-managed lands throughout the United States, including those of the National Forest System and Bureau of Land Management (BLM).

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BlueRibbon Coalition serves as a leading advocate for responsible management of recreation on public lands. This role has included partnering with academia, conservations groups and the agencies in scientific research and supporting educational projects to address excessively loud OHV exhaust noise, wildlife research and other issues. BlueRibbon is a grassroots, user supported nonprofit organization and has achieved a surprising prominence in the public land management arena. Many of our members and supporters live in and/or recreate in Nevada and use motorized vehicles, including off highway vehicles, to access lands managed by the Bureau of Land Management's Carson City District Office. In addition to access travel itself, BRC members visit the lands mentioned herein for motorized recreation, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping and other similar pursuits. BlueRibbon's members and supporters have concrete, definite and immediate plans to continue such activities in the future. Our members and supporters are interested in and will be directly affected by the Proposed Action. Please incorporate these suggestions into the record and carefully consider our suggestions. We wish to emphasize the critical importance of a well-designed RMP and properly integrated Travel Plan that can properly incorporate visitation and preservation of the "human environment" for the Carson City District Office. Note: In these comments we refer to the Resource Management Plan as "RMP" and the Comprehensive Travel Management Plan as "TMP."
National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, U.S. Department of Interior Bureau of Land Management, January 21, 2001, p. 1- 2. [BLM's OHV] Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an "acceptable use of public land wherever it is compatible with established resource management objectives."
As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage public lands on the basis of multiple-use and sustained yield, while protecting natural values... "Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands." National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, U.S. Department of Interior Bureau of Land Management, January 21, 2001, p. 2-3.
According to the latest report: Off-Highway Vehicle Recreation in the United States and its Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE), "an estimated 23% to 27% of Nevada residents participate in OHV recreation. The number of registered OHV enthusiasts in California counties adjacent to the planning area is much higher than the NSRE average of 18%." At least one Alternative should seek to meet the need to provide for increase motorized recreation experience.
C. BLM should not allow planning issues that are redundant with other agency planning direction or requirements to narrow the range of Alternatives and/or diminish the agency's multiple-use/sustained yield mandate. Our understanding is that a significant planning issue is a matter of controversy or, identified by the agency or stakeholders, over resource management activities or land use that is well defined and entails alternatives among which to choose, and may include concerns about potential serious deterioration of public land, significant impacts or conflict, or uses that may or may not be in the best public interest. When examining the CCDO's preliminary planning issues and national and statewide planning guidance, we find quite a few of them are redundant. For example, management of "special status species" and "rangeland health and vegetation" are directed by existing law, regulation and other statewide planning guidance. In reality, there are really very few, if any, alternatives from which to choose. Controversy over the management of these issues could be described as "moot," at least insofar as the development of the RMP. These are not the best Planning Issues.

Table C-4
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The concern our members have is that redundant planning issues serve to diminish the focus on the agency's multiple-use and sustained yield mandate, and, perhaps more importantly, unlawfully narrow the range of Alternatives. In layman's terms, this is how this works: The agency first takes the existing inventory of roads, trails and areas used for motorized recreation and applies its designation criteria found in regulation and other applicable planning guidance. This is done to minimize impacts to such resources as air, water, wildlife and habitats, vegetation and other natural resources. This usually results in a significant reduction in motorized recreation opportunity. Then the agency develops a "range" of alternatives based on the very same resources and concerns identified in the designation criteria, that have also been included as Planning Issues. Voila! The "range of alternatives" and "decision space" presented to the public drastically reduce the existing motorized recreation opportunity by between 60 - 80%.
Motorized recreational opportunity has been drastically reduced throughout the region. Travel management plans on adjacent BLM and National Forest lands have reduced opportunity for motorized recreationists, while at the same time provided additional opportunity for those who prefer a non-motorized experience. Future restrictions, including road and trail closures pursuant to the recently finalized Humboldt-Toiyabe National Forest Travel Plan, as well as adjacent BLM Offices in Nevada, will amplify this situation.
E. Comments on planning issues as identified on BLM "issues" webpage1 We have a few comments on some of the potential planning issues identified in the Notice of Intent (NOI) the issues webpage, the "scoping handouts" or "fact sheets," as well as various other BLM documents available on the CCDO RMP revision webpage2. 1. A quibble The discussion of a list of planning issues varies across various BLM documents. For example, Preliminary Planning Issue 1 as identified on the issues webpage "Restoring Ecological Health" is not referenced in the NOI. This has made it unnecessarily difficult to asses what issues may become "significant planning issue," as well as to comment on all the various issue related information and questions. Also, and we understand that this is water under the bridge, but the public would benefit by a more detailed discussion regarding the difference between a planning criteria and planning issue in the scoping materials. 1 https://www.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=32706 2 https://www.blm.gov/epl-frontoffice/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=22652&dctmId=0b0003e88020e137
12. Comments regarding Issue 15 as defined on the issues webpage -Special Designations We'll reference our quibble (comment 1 in this section) and comment that we are assuming Special Designations are addressed separately in the issue list in the NOI and in the Scoping Handout. Please see comments on the specific special designations in the sections below.

Table C-4
General Comments Related to the RMP

In Lyng v. Northwest Indian Cemetery Protective Association, 485 U.S. 439, 452-53 (1988), the Supreme Court warned against imposing "religious servitudes" over public lands, stating, "No disrespect for these practices is implied when one notes that such beliefs could easily require de facto beneficial ownership of some rather spacious tracts of public property. Even without anticipating future cases, the diminuation of the Government's property rights, and the concomitant subsidy of the Indian religion, would in this case be far from trivial: the District Court's order permanently forbade commercial timber harvesting, or the construction of a two-lane road, anywhere in the area covering a full 27 sections (i.e. more than 17,000 acres) of public land."

Some citizens hold religious beliefs that man is God's highest creation; that man is steward of nature; that man is to improve nature and make it fruitful for the benefit of man; and that it is idolatry to worship creation. Should we then give these citizens exclusive access?

Even the dissent in Lyng recognized that asking the government to restrict private parties' access to public lands for religious reasons is patently unlawful. Justice Brennan wrote, "Should respondents or any other group seek to force the Government to protect their religious practices from interference of private parties, such a demand would implicate not only the concerns of the Free Exercise Clause, but those of the Establishment Clause as well."

In a Draft RMP released for public review recently in Idaho, several recreation management "standards" and "objectives" seem to represent a wholly one-sided paradigm, providing exclusive access and special favor for a certain religion, and excluding opposing religious and non-religious considerations. The tribal religion-based restrictions in the Draft were presumed good. Other uses based on other beliefs/non-beliefs and philosophies were presumed bad.

Please do not misunderstand our comment here. Our members do not wish to hinder activities that are important to members of tribes. Our members believe management via the multiple use/sustained yield paradigm need not conflict with the tribal uses and values.

2. Comments on document 4.2 "Wilderness Characteristics and Wilderness Study Areas"
• Tell us about your knowledge of these areas or let us know of other areas that you feel should be considered for review of wilderness characteristics.

Many stakeholders across Western public lands states believe BLM has unlawfully embedded an ongoing inventory and protection scheme for lands with wilderness characteristics in its land use planning guidance. Unlike the US Forest Service, where direction from Congress provides the direction to inventory for wilderness during the revision of each Land Use Plan, this is a very controversial idea for BLM lands.

We respectfully ask the decision maker to carefully consider these comments when considering inventory for wilderness characteristics and potential designation of "LWC" or "Wild Lands" areas.

Table C-4
General Comments Related to the RMP

a; Introduction
BRC and its partners have on numerous occasions addressed the manner in which BLM may appropriately discharge its FLPMA-prescribed review and management of lands recommended for inclusion in the National Wilderness Preservation System as well as FLPMA-prescribed direction for values commonly associated with Wilderness character (recreation and scenic values).

In presenting this information, we specifically note and incorporate by reference the pleadings and decision(s) in the long-running State of Utah v. Norton, litigation. In particular, we note the District of Utah Court's summary, contained in its September 2006, opinion, which states:
It makes no sense that the same Congress that jealously recognized its sole authority to declare wilderness and that set up two major laws (the Wilderness Act and FLPMA) to accomplish a properly considered exercise of that authority, would have created within one general section (section 202) of FLPMA an open-ended authority on the part of the executive branch of government to create WSAs which, once created, result in de facto wilderness. The Wilderness Act's process clearly ended in ten years, and FLPMA's wilderness designation provision, including those relating to the creation of WSAs, clearly ended in 1991... (State of Utah v. Norton, 2006 WL 2711798 at *29 (Sept. 20, 2006))

The agency appears to be arguing that its non WSA lands with wilderness character are not WSAs, and that FLPMA allows management for certain resources associated with wilderness characteristics (appearance of naturalness, outstanding opportunities for primitive and unconfined recreation or solitude). Thus, BLM would appear to argue, the "non WSA lands with wilderness character" designation is legal and consistent with FLPMA and other laws.

However, as the NOI and other scoping information clearly indicates, the purpose of this effort concerns the inventory, review and management of BLM lands in order to protect and enhance values associated with Wilderness, and ultimately for the potential inclusion in the National Wilderness Preservation System.

Semantic nuance?

Some BLM staff has suggested to BRC that our arguments presented in these comments represent a "semantic nuance" and are therefore not relevant. As we understand their argument, BRC's problem is not what BLM is proposing to do, but rather how BLM is proposing to do it.

BLM staff point out that BRC and its partners recognize the BLM's directives to consider values such as the appearance of naturalness, outstanding opportunities for primitive and unconfined recreation or solitude when formulating land use plans. That is true. We also recognize BLM's authority to determine desired outcomes (goals and objectives) and allowable (including restricted or prohibited) uses and actions anticipated to achieve desired outcomes. We also recognize the BLM's ability to designate lands in the Primitive Administrative setting (recreation class), where motorized and nonmotorized uses are prohibited.

But the agency should not dismiss our concerns as simply a semantic argument. We note that neither Congress nor the District Court in Utah was making a semantic argument. The reason this 'nuance' is so important was quite well expressed in BLM's original Wilderness Inventory Handbook (WIH), as well as the Wilderness Act's Organic Act Directives: "Inventory and management for Wilderness character is extremely subjective and controversial." (emphasis added)

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b; Congress gave very specific instructions to the BLM regarding Wilderness

Those instructions are contained in Section 603 of FLPMA. Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality, and then to begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National Wilderness Preservation System.

That process has been completed. All stakeholders (including Wilderness Advocacy Groups) have exhausted the protest and appeal options. There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing wilderness inventory and review. Once the "603 Process" was completed, the agency is done with inventorying and managing for wilderness. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American People. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so is a tragic loss of management resources.

c; Comments regarding the potential utilization of the inventory criteria contained in BLM's current planning guidance
The lack of public involvement in formulating the "land with wilderness characteristics" inventory criteria as well as lack of public involvement in the inventory itself creates a high likelihood of a flawed result.

A serious concern we have has to do with the lack of public involvement in the development of inventory criteria and decision making guidance currently imbedded in BLM's planning guidance for "wilderness characteristics." These are not merely semantic arguments. These concerns are directly related to the agency's Congressional mandates and obligations to the public when developing management plans.

The original Wilderness Inventory Handbook (The Wilderness Inventory Handbook formulated for the inventory pursuant to FLPMA § 603, hereafter referred to as the WIH) on page 5 notes that:
"The wilderness inventory process requires full public involvement." This public involvement "is particularly important because the criteria in the wilderness inventory process call for judgments that can be highly subjective. In recognition of that fact, the BLM wilderness inventory process will be conducted as openly as possible with the broadest opportunity for input from all concerned, in order to arrive at a sound decision." (WIH page 5) This is precisely correct, and it's also precisely why any inventory for wilderness characteristics made pursuant to this planning effort using BLM's planning guidance has a high likelihood of being fatally flawed.

The agency, when formulating inventory criteria during the original wilderness inventory, understood that, unlike inventories for plant and animal species, or oil and gas potential, qualities that make up "wilderness characteristics" are extremely subjective. The process is no less subjective and the task of doing a professional inventory no less difficult today. Full public and intergovernmental comment, review and involvement is every bit as necessary as they were in the first inventory.

When developing the current (flawed) wilderness inventory guidance, the agency claimed that the only section of FLPMA that applies during any re-inventory for "wilderness character" was section 201, and therefore the important public involvement provisions do not apply to the planning guidance. This is clearly wrong. Numerous sections of FLPMA and NEPA require full public involvement and participation of State, Local and Tribal officials.

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d; Congress specifically precludes the agency from inventorying and management for a single resource value It is unlawful to make decisions based upon an inventory for a single resource value.

Making a decision to manage an area in a primitive recreation class because the area has been identified to have "wilderness character" is no less appropriate than making a decision to implement a full field development for oil and gas based solely on inventories for mineral and oil and gas resources.

BRC acknowledges that the agency can inventory to its heart's delight. This includes inventorying for resources or values associated with wilderness. However, the mandate for resource inventory contained in FLPMA Section 201 does not allow for formulating management plans based on an inventory for a single resource value. All resources described in Section 201 must be included in your inventory for wilderness characteristics.

Whenever making any land use planning decisions, the agency must comply with its congressional mandate to inventory for the "global" range of resources. The agency must not make decisions based on incomplete inventories or inventories based on a single resource value.

FLPMA Section 201 directs the Secretary to: "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern." It is clear from this language that all resource and other values on the public lands were to be part of a single inventory. When planning, there is no authorization for the agency to engage in inventories for a small segment (Wilderness) of only part of the spectrum of "resources and other values" (recreation). It is clear from the parenthetical phrase inserted in this section by Congress that Congress wanted the broadest range of resources and values considered and listed specifically two among the many which were to be included.

When inventorying for "wilderness characteristics" in this RMP revision, the CCDO must also inventory for and disclose the full range of other resources, including mountain bike and motorized recreational activities. The analysis must disclose the impacts to those resources of any management that would "protect and enhance" the wilderness characteristics within each area. Also, an alternative should be developed that contains no new "non WSA lands with wilderness characteristics.

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3. Comments on document 10.2 "minerals" and 10.3 "geothermal development"

The BLM wants your input...
• How should mineral development be managed to minimize resource conflicts?
• Are there public lands that should be withdrawn from mineral entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on mineral development? If so, what are they and where should they be applied?
• What are the potential social and economic effects associated with mineral development? How would planning decisions affect communities in the Carson City District? How can the BLM improve the management of geothermal resources?
• How should geothermal development be managed to minimize resource conflicts?
• Are there public lands that should be closed to geothermal entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on geothermal development? If so, what are they and where should they be applied?

BRC supports reasonable development of our natural resources, including minerals, oil and gas and "renewables," such as geothermal, wind and solar. Generally, there is support among our members and supporters for development mineral resources and of oil and gas resources in the planning area. There is a high degree of confidence in BLM's ability to regulate this activity so that it is both economically feasible and environmentally sound.

G. Comments on planning criteria
Here are a few comments and thoughts on planning criteria as listed in the NOI and in FLPMA.

FLPMA Sec. 202, particularly subsection ©(1) that specifically requires development and revision of land use plans on the basis of "principles of multiple-use and sustained yield." FLPMA section 102(a) (7) also specifically requires that "goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple-use and sustained yield unless otherwise specified by law."

43 C.F.R. 1601.0-8 provides, "The development, approval, maintenance, amendment and revision of resource management plans will provide for public involvement and shall be consistent with section 202 of the Federal Land Policy and Management Act of 1976. ..." 43 C.F.R. 1610.4-4 states, "The analysis of the management situation shall provide, consistent with multiple-use principles, the basis for formulating reasonable alternatives, including the types of resources for development or protection." 43 C.F.R. 1610.4-5 states: "All reasonable resource management alternatives shall be considered and several complete alternatives developed for detailed study. ..."

We know we are droning on a bit here, but we hope the planning team will not let multiple, redundant planning issues and planning directives that have strayed a bit from the congressional mandate preclude developing alternatives which embrace the multiple-use sustained yield mandate.

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H. Comments on Comprehensive Travel Management
Below are some comments regarding Comprehensive Travel Management.

1. "Two Plans" problems/suggestions
Given the size of the planning area, the volume of recreational travelways, the wide range of diverse recreational uses and the popularity of several areas for OHV use, we are concerned about the ability of the BLM to successfully adopt a programmatic RMP simultaneously with a project-level Travel Plan of the detail and complexity attempted here.

A land use plan such as a BLM RMP is "designed to guide and control future management actions and the development of subsequent, more detailed and limited scope plans for resources and uses." 43 CFR 1601.0-2 (emphasis added). An RMP "is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations." 43 CFR 1601.0-5(k).

The "two plans in one" model presents challenges, if not insurmountable hurdles, to the proper execution of these varied planning elements. The agency and public must be able to fully utilize the concept of "tiering" in the planning process. The programmatic RMP and the site-specific Travel Plan are both "moving pieces" of the same puzzle. The challenge is to 'adapt and refine' the travel plan across the RMP alternatives. Also, potential benefits that might result from a "amendment" of a programmatic RMP through a subsequent and more focused Travel Planning (such as a RAMP for a SRMA).

Aside from these more 'conceptual' or '30,000 foot' issues, there are the practical concerns created by doing too many tasks simultaneously. Both the agency and the public will be expected to process an immense number of issues and volume of data in a relatively compressed timeframe. This potentially handicaps the agency's ability to adequately disclose and analyze the issues and conclusions presented in the DEIS/EIS, as well as the public's ability to meaningfully participate in the process.

These concerns may operate in opposition to one another. In other words, in order to meet the first concern, the agency might frustrate achieving the second concern, and vice versa. The sheer volume of information that may be required for the agency to satisfy the increasingly more stringent procedural and substantive requirements in presenting its conclusions might nullify the ability of the "average" CCDO visitor to even read, let alone comprehend and comment intelligently upon, the agency's analysis. Moreover, presenting the program- and project-level decision alternatives and decisions in a digestible fashion may result in an illegally-truncated analysis.

We hope the CCDO can rise to this unprecedented occasion. But we'll ask here if consultation with the State Director and state office planning staff to at least consider the prospect of severing project-level travel planning for subsequent analysis in a stand-alone public process might be a better "path forward."

Finally, it must be emphasized that site-specific, on-the-ground management prescriptions must be supported by correspondingly-detailed data and analysis. See 40 CFR § 1502.24. The agency cannot avoid this requirement by making broadscale site-specific designations under the guise of "programmatic" planning. In other words, a regional prohibition on vehicle use based camping does not absolve the agency of a duty to disclose and analyze the effects of camping on discrete, individual sites throughout the applicable region. Such analysis is lacking in the DEIS.

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2. Regarding routes with contested and/or overlapping or concurrent jurisdiction .
The Final Plan and ROD must more completely address routes which are subject to overlapping or concurrent jurisdiction, such as routes identified as county roads.

BRC supports and appreciates the agency coordinating their planning with state and local governments. See, e.g. 43 U.S.C. §§ 1720, 1744. This process should recognize routes that are asserted as valid existing rights of ways by the state and the county. We understand that the agency may elect to simply state that only a federal court can adjudicate the validity of a contested right of way. However, this is not the only option open to the BLM. Also, it seems reasonable for the agency to include a concise discussion regarding the dispute over county roads in the analysis.

3. The agency should disclose which routes will be classified as BLM Roads, Trails and Primitive Roads.
The DEIS and draft TMP should specify if a route is a Road, a Trail or a Primitive Road pursuant to agency directives.

5. Comment regarding recreational user conflict
It seems that barely a week goes by before some BRC member forwards us an "action alert" from various Wilderness advocacy groups encouraging their members and supporters to send comments to land managers regarding OHV management on federally managed lands. We certainly defend their right to do this, however, we have noted that they have increasingly encouraged their supporters to refer to Executive Orders (EO) and often give detailed instruction on how to and what to say regarding the user conflict issue.

This appears to be a growing trend with these organizations, so we can imagine the planning team may have already received comments referring to perceived conflicts between motorized and nonmotorized visitors. We would like to take this opportunity to go over several points regarding this management issue.

A synthesis of the literature on user conflicts on multiple-use trails, sponsored by the Federal Highway Administration in 1995, tells us that user conflict is not due to any "inherent incompatibility" between different trail activities. It is a perceived "goal interference" on the part of the offended trail user. For example, a hiker who dislikes motorcycles is in no physical danger, but his expectation of a quiet time in the forest is thwarted when he meets a motorcycle rider on the trail. Thus, according to the research, the key element for the elimination of genuine, heartfelt conflict for any given individual is to make sure that every person who uses the trail system knows what to expect, and that the resulting experience is consistent with that expectation (Moore, 1995).

Given the long history of motorized vehicle use in the planning area, visitors who do not use OHVs are used to seeing them. In addition, a large percentage of the CCDO visitors know where to find nonmotorized experiences. Recreation User Conflict is expected to be minimal.

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Finally, with the publication of the TMP, recreational user conflict should be significantly reduced or eliminated. CCDO visitors who may experience 'conflict' when near motorized uses can simply consult the map to find areas where their preferred recreational activity may be found.

In order to amplify our concerns of manufactured conflict vs. real conflict, we would like the planning team to consider the following statement by Art Seaman. Art is an avid snowmobiler and regularly comments on summer and winter recreation plans throughout the West.

Art says:
Conflict is an integral part of the human condition. We first experience it when we leave the warm confines of our mother's womb to be greeted with a stout slap on our behinds. From then on it is downhill -establishing ownership of toys other children covet with a loud "MINE!" Competing in school, sports and jobs to establish our position in society are as natural as breathing. When our space, possessions, status or security are challenged we bristle and defend, sometimes with words and sometimes with actions.

In managing outdoor recreation and responding to assertions of conflict, managers need to objectively determine the seriousness of the alleged conflicts, and allocate the existing recreation opportunity in a balanced and fair manner, in accordance with the land managing agency's broad mandate under law.

There is real conflict and there is manufactured conflict. Land managers must learn to tell the difference. Comments demanding exclusive use because of alleged conflict are to be expected and must be objectively analyzed in the public land planning processes. Sadly, managers themselves sometimes jump on the conflict bandwagon, driven by their own biases or striving to be peacemakers.

Management decisions driven by the desire to alleviate someone's perception of conflict often backfire. Those alleging conflict, or are simply intolerant of other users, most often are rewarded with exclusive use. Exclusive use necessitates regulation, creating a need for enforcement and thus creating real conflict. The land managers now find themselves with a legal obligation to arrest people who are engaged in an activity that was once legal and appropriate, and subject them to serious civil and criminal penalties.

Suggestions:
Alternatives should include:
• Educating the non-motorized visitors about when and where they may encounter vehicle traffic as well as informing them of areas where they may avoid such encounters.
• Educating the vehicle assisted visitor of where the road or trail might be shared with nonmotorized visitors and encouraging slower speeds and a more courteous ethic in these areas.
• Re-routing either use so as to avoid sections of roads or trails that are extremely popular with both groups. For example, a hiking trail can be constructed to avoid a section of popular OHV route. Or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc.
• Dispersing all forms of recreational use so as to minimize conflict and create a more desirable experience.

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There is an additional and important concern about the way in which the agencies have described this project. Our concerns is that, because the public was not adequately informed of the scope of this project, and that non-motorized trail based activities will be limited to designated routes, the agency will be reluctant to consider available options for providing non-motorized recreational routes, such as constructing new non-motorized trails when there is a need to address resource impacts and/or recreational user conflict. From the motorized visitor's perspective, this course of action easily results in a scenario where the existing inventory of motorized recreational opportunity is used as the "inventory" to develop the nonmotorized portion of the comprehensive system. This scenario represents an unacceptable 'systemic bias' against motorized visitors. If the agency is going to attempt to do the comprehensive plan, then it must ensure the effort has been properly scoped. The agencies should also inform the public of available options, including providing newly constructed mountain bike, non-motorized trails and even motorized trails in order to provide a sufficient trail opportunity for all visitors.
When federal agencies evaluate technical issues or apply specialized expertise, NEPA requires them to rely on valid sources and to disclose the methodology, present hard data, cite by footnote or other specific method to technical references, and otherwise disclose and document any bases for expert opinion. 40 C.F.R. § 1502.24; Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1150 (9th Cir. 1998). When applying NEPA, agencies must: utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man's environment....
42 U.S.C. § 4332(A); 40 C.F.R. § 1502.6. NEPA does not envision undocumented narrative exposition, instead requiring: Agencies shall insure the professional integrity, including the scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix.
40 C.F.R. § 1502.24. Where information is not provided in the NEPA document itself, but is only cross-referenced: "The propriety of such incorporation is dependent upon meeting three standards: 1) the material is reasonably available; 2) the statement is understandable without undue cross reference; and 3) the incorporation by reference meets a general standard of reasonableness." ...[T]here is no evidence in the record concerning the public availability of other incorporated materials. In addition, although it appears that the EA is dependent on these documents to support its finding of no significant impact, [ ] the EA does not appear to specifically cite to which documents or portions of these documents support which conclusions. This requires undue cross-referencing. It appears that the incorporation of these materials fails the general reasonableness test. Defendants have failed to point out where these materials are specifically cited to in the materials to support their conclusions. Siskiyou Regional Education Project v. Rose, 87 F.Supp.2d 1074, 1098 (D.Or. 1999) (quoting NRDC v. Duvall, 777 F.Supp. 1533, 1539 (E.D.Cal. 1991)) (internal citations omitted).

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K. Data Quality Act BLM's preliminary issues are deficient in excluding consideration of the Data Quality Act, Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, and related Department of Interior Information Quality Guidelines and BLM Information Quality Guidelines. The DOI guidelines provide at II.5 that during public comment procedures, requests for correction will be considered and provide at III.4 that a request for correction not made during the draft stage may be considered "to have no merit" if the bureau or office determines that the requester had the opportunity to comment. BLM's Preliminary Planning Issues fail to advise the public of its opportunity to comment regarding data quality. In order to comply with the Data Quality Act, draft alternatives must be based upon data of "sufficient transparency and methodology." In order for the public to comment on proposed alternatives, it must know the information bases for specific actions proposed therein. Therefore, the agency must, at the draft stage, publicly document the scientific literature or other information upon which it intends to support each alternative, if it is adopted. The public must be allowed to challenge insufficient data before a final alternative is selected. BRC intends to challenge alternatives, or elements thereof, that are based on junk science or anecdotes. The agency must document a nexus between any alleged "need to protect" and any resulting decision to restrict motorized travel
L. Conclusion BRC appreciates the opportunity to comment on these important plans. BRC is eager to assist land managers to formulate balanced and enforceable land use plans and we hope these comments have been helpful in beginning your journey. We understand comments such as these are not as clear or concise as they could be. Please do not hesitate to contact us.
My husband and I are recreational shooters and we use the desert, we are not the slobs leaving a mess out there. The same ones who dump their trash out there are probably the same ones who use the trash for fire practice or just use it for fun. We police out shells and take everything with us, we take water out with us in case of fire and when the conditions look like it will be too dry, we simply do not go out. We take safety seriously and we take the care of Nevada seriously and to penalized us for others carelessness is beyond unfair.
So you want to get rid of the wild horses and now the wild land... come on guys, use your time elsewhere and make a real difference.
More than anything I am really hoping that the RMP will ensure that my children will have places to take their children to ride. Public lands are valuable and need to be managed in a way that everyone can enjoy it. Compromise and management will take us all much further than closure ever will.
I disagree to any closer of any blm land to hunting or shooting sports
Please consider the truth of the whole picture and understand that once the questions are out there, they must be addressed. The interest of Americans in the care and management of our wild horses is growing.
wild horses are a symbol for freedom and independence, close connected with the history of the USA. What happens with them now by the roundups of the BML is only a shame.
The BLM is an organization that fights against wildlife everywhere. Wolves, buffalos, bears, mustangs, coyotes, burros, they all are in the way of humans. Why the hell can humans not tolerate them and learn to share the habitats?

Table C-4
General Comments Related to the RMP

I am writing to urge Carson City to do the right thing and protect these horses and burros. Too often the BLM has cared more about eradicating and removing the wild horses and burros that have called these lands home and instead given preference to ranchers and cattle. That is not "land management," but being in the pockets of those who make money from these practices. Please, don't remove these animals. They have called this land home a lot longer than humans or cattle have been there. They deserve to stay there in peace.
I do have an affiliation. I am a citizen of the United States of America and reside in Nevada and have for 57 years. I would like to be notified when the BLM meets to decide the future hunting and fishing in our state.
The situation regarding surface mining on the Comstock is fraught with complexity, but one bedrock fact seems clear: this ground was poisoned with mercury. No-one knows exactly where it is, but anecdotally it is in American Creek and other places the local kids play. And no-one knows how much is out there, although it is thought that some 7,500 tons of mercury accumulated in the soils of the Carson River Mercury Superfund site, along with unknown quantities of arsecic and lead. But we do know that disturbing in the dirt as CMI is now so busily doing is what makes these toxins so damaging to human health. Left alone they do no harm so long as they stay out of the waterways. But once dispersed into the air, these substances move with the wind and settle into our homes and our waterways -- and onto the steaks we're grilling in the back yard.
With respect to the RMP process, it should be required that all hearings be well publicized by providing sufficient notice for all future meetings & comment periods by advertising not only in the legal section of the newspaper, but on radio, TV, and on-line media. I am also requesting that when graphical representations of proposed restrictions are conceived, that a composite map showing the multiple proposed restrictions be prepared so the public can visually grasp the full and complete magnitude of the impact the restrictions or ban proposals will have. In closing, I strongly urge the BLM to only consider restricting or banning activities when significant and substantial needs are proven for a specific area based on sound data and information.
PZP is now EPA approved and offers a cost-effective and humane alternative for population control. Further, I strongly object to the permanent sterilization (i.e. gelding, spaying, etc) of wild horses on the range and object to sex ratio skewing without the completion of significant scientific studies to outline and understand the implications of sex ratio adjustment on the range.
Using Steiter-Lites in lieu of roundups would fulfill the minimum feasible clause of the Act, and keep burros out of holding. According to Roger Oyler, State Lead for Burros and Wild Horses in Arizona, even burros are not being adopted at the present time. Leaving burros on the range is essential from both a humane and fiscal standpoint.
I want to go on record that I oppose the closure of areas and roads onto publicly owned lands that are maintained by BLM & the Forest Service.
I am against any proposed ban to recreational shooting in your RMP. I feel there are too many restrictions being constantly proposed and enacted on public lands today.
Also, I find the very secretive announcement of the revision meetings deplorable. I think that for such changes, the general public should be well notified, not just some small blurb in the notices section of the newspaper!
I have lived in this area of Nevada for 39 years. I have enjoyed my public land and want to continue to do so even more in the future. I also want future generations to have the same opportunity that I've enjoyed. I have hunted, fished, hiked, camped, geocached, rock-hounded, and ridden my ATV on BLM managed lands. I have also donated a great deal of my time and energy to build water developments for wildlife (guzzlers), perform stream restoration work, conduct sage grouse lek surveys and do general clean-up on BLM managed lands as a form of "pay-back." In short, I care about my public land.

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I have been informed that the BLM, Carson City District-Sierra Front and the Stillwater Field Offices are seeking public comments to identify issues and concerns. My husband and I enjoy off roading and take trails at least once a month, usually more. We love off roading because we love and respect nature.
I AM WRITING ABOUT THE MAP LEGEND AND COLORS, THEY DON'T MATCH
To be considered as a potential ACEC and analyzed in resource management plan alternatives, an area must meet the criteria of relevance and importance, as established and defined in 43 CFR 1610.7--2 An area meets relevance criteria if it contains one or more of the following: • A significant historic, cultural, or scenic value (including but not limited to rare or sensitive archeological resources and religious or cultural resources important to native Americans). • A fish and wildlife resource (including but not limited to habitat for endangered, sensitive, or threatened species, or habitat essential for maintaining species diversity). • A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features), • Natural hazards (including but not limited to areas of avalanche, dangerous flooding, landslides, unstable soils, seismic activity, or dangerous cliffs). A hazard caused by human action may meet the relevance criteria if it is determined through the RMP process that it has become part of a natural process.
The value, resource, system, process, or hazard described in the relevance section must have substantial significance and values to meet the importance criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following: • Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. • Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. • Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. • Has qualities that warrant highlighting, or poses a threat to human life or safety.
Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long--term Viability for Sage--grouse and Other Sagebrush--dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations.
We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage--grouse EIS process. Please feel free to contact us if you have any questions, need further information, supporting evidence for, or clarification of issues raised here.
The SHPO supports the Carson City BLM's RMP efforts. If this office can be of any assistance in this effort please don't hesitate to ask. The SHPO has the following recommendations for further review during this effort:
I am very concerned about the new RMP revisions being considered for the Carson City District, specificaly in reference to how it will effect our wild horses and Burros.

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Wild Horses and burros are part of our American heritage. They deserve a place to exsist in their wild state. How sad if they no longer exsited in the wild. There is no animal that captures the essence of freedom more than wild horses running as god intended. While selfishness is part of our profile as a species, we also can have a deep reservoir of empathy, and our capacity to understand the vulnerability and pain of others motivates so many good works in our society. That trait allows us to have an emotional connection with other species as well, horses are one of these animals. Let these horses remain wild... And untouched by man kind.
As a horse owner and rescuer I am appalled at the continued unnecessary round ups of our wild horses. This is not what Congress intended when it afforded protection for wild horses and burros. These horses belong to the American people. I urge the Carson City District Office to consider the interests of "we the people", Americans, that own these horses and not just local and commercial users of our public lands. The new RMP (Resource Management Plan) must recommend options for increasing wild horse and burro appropriate management levels (AML), reinstating wild horses to zeroed-out herd areas (HA) and ensuring that wild horses and burros are afforded equitable distribution of resources within designated habitat areas.
As an almost life long Nevada resident, I find it appalling that BLM has denigrated itself down to range mangers for the cattle industry. You do not work for the cattle industry, you work for the people of the United States in managing their property. It is your fudiciary duty to make sure that the needs and concerns of the MAJORITY of the American people are met and sustained. The Cattle Lobby are NOT the majority of the American people, yet they seem to have the power over decisions made by your agency. I urge you to seriously consider and impliment the suggestions below. Please remember that cattle are visitors on the American People's land. Horses are residents.
A whole new rational well-thought-out plan needs to be implemented. The most effective proven option now available is humane population control which should be immediately implemented which will accomplish the long range goal and reduce taxpayers' expense.
I am deeply disturbed by the lack of caring for the mustangs & burros and the lack of following the law that is displayed by the BLM in this matter. The BLM is nothing at this time, but water carriers for the greedy ranchers. This is not how the law was intended. It was to protect the mustangs & burros & the true meaning of the law must be reinstated. Ranchers do not own public lands or the wildlife therein & they should not have a major say in how the public lands & wildlife are treated.
The creation of an up to date RMP for public lands managed by BLM's Carson City District office needs to provide for fair and equitable use of resources for our nation's wild horses and burros, including the land itself. The following is a list of items I feel should be addressed in any document regulating management of wild horses and burros.
We've traveled here for years, mostly to see wild horses. This zeroed-out policy is just ridiculous, a waste of money and abusive. It appears that 'money ' is being appeased. Does 'public' need to be redefined by dollars versus people so we know what we're really talking about?
Get rid of non-native cattle and there will be LOTS of room for the horses.
Must we do to these majestic animals what we did to the American Indians? That is what it is looking like to many Americans.
This is public land for wild animals. Not privately ownd domestic animals. Tell the cattle men to buy private land for their cattle and leave the public land for the wild animals.

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Every time I hear politicians talk about the federal deficit, I shake my head over the amount of taxpayer dollars that is spent rounding up wild horses and burros to appease the cattle industry. The BLM was designed to oversee public lands for the entire country, but this agency has turned into a lap dog for cattlemen. Every time I look at a hamburger, I think about the countless suffering inflicted upon wild horses and burros and have a salad instead.
I STRONGLY ASK YOU, the Carson City District Office, to consider the interests of our PLANET EARTH, not just local and commercial users of our public lands, when making the new Resource Management Plan (RMP) and all other land-use documents tiered to it.
Do not round up horses, leave them on the range.
PLEASE! Do the right thing. The right thing is not saving money or making money. It's not winning a senate seat, presidential campaign or more votes for - whatever.
As usual, my government makes me sick. How many petitions do your tax payers have to sign before you listen to what we actually want, and not what's going into your pocket?
We always hear the U.S. criticize other nations as to horrendous treatment of their people and their animals. It's time to look ourselves in the mirror, practice what we preach, not CLAIM to be a moral, compassionate country but to DEMONSTRATE our values, leading the world by setting a fine example. Everything seems to be about money these days. What would happen if we tried a little kindness and used some common sense?
Do not round up the horses, then take them to small pens. What is going on with allowing this to happen. Let them roam in the range.
Please read this message on behalf of the people who desire kinder treatment of our wild horses. We urge you to take to heart the following actions to help keep our wild horses on the land they have a legal right to inhabit. Thank you.
Please be kind to wild horses and burros! They are the icon of the American West and are much beloved by Americans.
As a lover of nature and animals--and particularly equines--I urge you to protect the wild horses and burros from further horrifically cruel attempts to annihilate them.
Quality of life for all people and animals should not be based solely on economic profit criteria. Wild horses and burros deserve to live and their numbers managed by humane natural methods as cited above.
Nevada is a tourist destination for the younger members of our family and they would to see wild horses IN The Wild, not in dry lots. Let's take care of our horses and make sure they have enough land to live on.
When are we going to be smart enough to understand that in the state of Nevada wild horses could be used as an assets for tourism and educational purposes?

Table C-4
General Comments Related to the RMP

I am a citizen of the United States, and I am writing the BLM to make my strong feelings known in hopes it will listen to the American people who pay its way. First I want to say I am disturbed at BLM's practice of discounting thousands of letters, including my own in the past, because I/we clicked on a pre-written letter which articulated very will my/our personal feelings. BLM has publicly stated it viewed 4,000-plus letters as only 1 because people clicked on a form letter. Is BLM now declaring the Petition process in our country void? Because petitions, where people list their personal names and addresses in support of a pre-written, articulate proposal, thereby making it their own, are legally taken seriously, and the individuals who sign on are counted individually. I insist that this letter, to which I electronically sign my name, be counted individually.
Wild horses and burros are also important to wild ecosystems, because horses evolved in north American and continue to contribute to the ecosystems in positive ways. My family enjoyed seeing the wild horse fossils at the Hagerman fossil beds, for example. Ecological research shows that buffalo in north america function differently than cattle in ecosystems and the same for zebra in Africa compared with other large herbivores. Each animal contributes to the ecosystem it is developed to be in. In the same way the natural expansion of wolves back into their traditional roles benefits ecosystems as well and promotes a wider variety of species and more balanced numbers. I am sorry i don't know if wolves are one of the predators native to all of nevada, but having wild horses and burros is complementary to the natural Nevadan predators while having cattle usually works to the predators detriment and thereby damages the whole ecological balance.
Do not lump this in with all similar comments as "one" comment for your purposes. This is disenfranchisement. We are taking the time to care.
As you probably know 80% of Americans want our wild horses. In my opinion 15% has no idea whats going on and 5% want them eliminated for their own profit. Lets not break your promise to protect wild horses not to eliminate them.
Blm, please leave wild horses and burrows alone. No more roundups. Let ms. Pickens put horses and burrows on her eco-sanctuary.
FIRE Bob Abbey and Ken Salazar for not doing their jobs of protecting OUR wild horses on OUR public lands. Remove all privately owned cattle from OUR public lands.
My family and I enjoy viewing wild horses AND BURROS when we go to Nevada! So do other people. You can't just get rid of them. Your job is to ENSURE A FUTURE for these historic/ iconic animals on the range.
PLEASE CONSIDER ALL OF THE ABOVE.... Thank you for your SINCERE consideration.
I am 50 and live in So. Tahoe. Me my family and friends have ridden from topaz to the Black Rock for the last 15 years, mostly riding from the dump in Gardnerville or Johnson Lane. We ride dirtbikes and dry camp and I have done about 10 races in our area including VA grand prix. I have about 500 days riding in your area.
Reference material for consideration attached: #1 Lyon County Comprehensive Master Plan #2 Lyon County Interim Public Lands Policy

Table C-4
General Comments Related to the RMP

The Carson Valley Trails Association (CVTA) has been working with the BLM for several years on an east Carson Valley non-motorized trail system, relatively close to the urban front area. Much of this trail system will become part of the Discovery Trail, anticipated to become a National Recreation Trail and theme trail around the entire Carson Valley showcasing the areas rich history, culture and natural resources.
I was concerned to see the Sage Grouse Critical Area shown in the Sugarloaf/Vinegar Peak area. I have never seen any sage grouse in this entire area in 15 years of weekly riding. The presence of ideal habitat does not represent a bird population and I do not believe there is any real population there. Regardless, the critical habitat area is not sufficient grounds to restrict access.
AREA 1 (outside the dotted blue line): I ride in the area north o fFish Springs Road on a monthly basis. The Pah Rah Range once per year.
In closing, I want to provide a little perspective on who it is that truly utilizes public lands for recreation. In my 15 years of avid riding in the Carson City District, I have crossed paths with less than half a dozen equestrians, only 2 hikers, and surprisingly not even one mountain biker (too much sand I guess). During hunting season I do regularly see a variety of pickups and ATVs, on most every ride in October and November. I come across other dirt bike riders about half the times I go out (about 30 times per year), and I generally try to ride where everyone else isn't. My point is that motorcycles are percentage wise by far the highest recreational user of public lands. I believe easily in excess of 75% on an annual basis. The RMP must fully recognize this fact and likewise have a focus that maintains this function and legitimate use.
I know you hear from preservation advocacy groups (most of which are well funded lobbyists, and some of which are radicals), with a battle cry of "save the land for future generations". What they really mean, as history proves, is "close the land" to all vehicles and industries (misleading the general public that people hike to extremely remote and dry areas, which they don't, as evidenced by my data above). I submit to you that future generations will want to ride motorcycles and OHVs on public lands as my three young children and their young friends already greatly enjoy. Clearly motorcycle and OHV riders share responsibility in being good stewards of the land and I am teaching my children those values. Respectfully, it is your responsibility as public servants/project managers to maintain a land use and recreation plan that accommodates and enhances features for the highest percentage user. Perhaps this plan can recognize certain areas as exceptionally valued riding areas (Areas 2 and 3 in my opinion) and given an enhanced motorcycle/OHV designation while still recognizing the "open" designation is of utmost importance throughout all of northern Nevada.
The purpose of my comment is to stress the importance of the "Vegas to Reno" event held in August (August 17, 2012.) This event is very important to rural Nevada. Over 5,000 people, racers and pit crews, travel through rural Nevada; we go thru Las Vegas, Beatty, Goldfield, Tonopah, Mina, Hawthorne, Fallon, Dayton and Reno. We sale out these towns of gas, food, lodging, ice, and auto parts. Special Events are very important to any community and I know the people in the above mentioned communities count on the revenue from this event every year. The "Vegas to Reno" race began in 1996 and is the flagship of Best In The Desert. The race receives world wide coverage and the event is televised, again giving Nevada exposure. Nevada is the only state in the United States, that an event like this can be held and the BLM permitting this event is a real feather in their cap being able to permit an event of this magnitude. Thank you very much for allowing me to comment on the importance of "Vegas to Reno!"
The CVTA works closely with Douglas County on implementing the County's 2003 Comprehensive Trails Plan, which this proposal closely follows. CVTA also works with the USFS, The Nature Conservancy, private landowners, the Washoe Tribe, Carson City, and numerous other entities to develop and maintain quality trails systems in the Carson Valley area. CVTA has developed about 30 miles of trail elsewhere within Carson Valley, including about 10 miles of the Discovery Trail.

Table C-4
General Comments Related to the RMP

CVTA also supports retention of those areas around this proposed trail system to remain in public ownership, whether by BLM or Douglas County for the future enjoyment of all users. These lands are used extensively by many recreational user groups and activities. Retaining the open landscape and character of the area will protect fauna and flora resources, preserve historical an cultural values, keep viewscapes intact, and maintain public access to current urban front areas.
1. I tried to call and discuss these comments before I submitted them, but the RMP project manager was not available.
As an avid outdoorsman, one of the primary reasons my family moved to Nevada is the largely unfettered access to huge open areas of land (BLM) available for multiple public use. As a family, our primary interests are: - Hiking - Horseback riding - Shooting - Hunting - ATV/Dirtbike riding
Lets leave the Public lands to the public. I have seen so many public lands closed to the public because someone at BLM deems It necessary to fence off all public lands from the public. The lands In Nevada are for public use. Let's leave It the way it Is. I don't hear anyone complaining about public lande except people who have had public access blocked and fenced off by BLM. Public lands are for the public. If you want to put this issue to a vote on a ballot and have the public vote on it, fine. Spend your own personal money and put it on a ballot. Otherwise stop trying to justifying your job and leave things alone. Your services will not be needed If you continue to pursue this. You should be replaced by closing all public lands to the public. It looks like your policy Is "If It Isn't broke, fix It until It Is". STOP NOW. Call or email me with questions.
Magma Energy (U.S.) Corp. Is In support of the carson City District Office's preparation of an updated Resource Management Plan. As a geothermal energy developer and producer, we have experienced first-hand all phases of the permitting process, and we would welcome the opportunity to assist the carson CitY District Office In these efforts.
My concern is that the BLM is losing sight of the fact that public land is owned by the public, therefore the BLM should be making an effort to improve and encourage land access by the public rather than making access more restrictive. Public uses such as camping, hiking, hunting, fishing, ORV riding, shooting, sightseeing, and so forth must be ENCOURAGED rather than DISCOURAGED. Making more areas either off limits or making legal entry so complex that the majority of people are not able to access lands legally is wrongheaded and is NOT the duty of the BLM. Any new rules or laws that restrict land use by the private individual are not in the interest of either the public nor in the interest of longevity for the BLM.
In my opinion, the BLM should not be making more new laws that only discourage use of public land by the public. Rather they should spend their allocated time and money enforcing common sense laws to preserve the land for use by private individuals. Arresting and pressing actions against people that dump their garbage and do other such irresponsible things to OUR land should be the BLM's primary focus. I am NOT for more restricitons!

Table C-4
General Comments Related to the RMP

I urge the Carson City District Office to consider the interests of all Americans, not just local and commercial users of our public lands, when crafting the new Resource Management Plan (RMP) and all other land-use documents tiered to it. The new RMP must recommend options for increasing wild horse and burro appropriate management levels (AML), reinstating wild horses to zeroed-out herd areas (HA) and ensuring that wild horses and burros are afforded equitable distribution of resources within designated habitat areas.
I write to you as an interested party to wild horses and burros. When crafting the new (revisions) RMP for the Carson City District the following should be paramount as this mandated use has become threatened by the encroachment of other users.
The vast majority of users of public land have considerable resource available to their use. Wild Horses and burros are restricted to the boundary lines that, in many cases, were inaccurately drawn. This finite, and flawed, space is vital to the survival of this American Heritage species as intended by Congressional law. Within these boundary lines horses and burros are to be considered a principle, but not exclusive, use. Currently they are not managed as such. This mandated use is the lowest of priority. To perpetuate a use of public land the viability of that use must be first priority. Populations must be managed to perpetuate the species with a minimal level of interference. Populations capable of breeding to sustain genetic viability, without interference, must be maintained before other uses are allowed.
Please recognize that the vast majority of the public is unaware of the decision making process on public land. There is an assumption that horses exist protected and viable due to an act of Congress. A greater effort needs to be made to educate the public to the multitude of projects that have potential impact. The damages to wild horses are not being appropriately mitigated without public participation, yet the public remains uneducated to the process.
1. I enjoy the free access to enjoy family riding. From a individual that moved from Las Vegas and understand the confusion of closing access will have in the freedom to ride
2. My family is very concerned with the environment and I teach my children to take care of our riding areas. 3. All my children slow when near livestock and often stop to enjoy the beauty. 4. I teach my children to ride only on trails only. I spend many hours in the desert and rarely see other people then riders.
5. I spend 3-4 days a week at Moonrocks with my son and daughters. To take that family time away would be horrible to my family. We travel 3-4 times a year to San Mountain. We as a family live and love to ride!
I would just like to express my concern for access to trails, communications, and topics of concern that may effect my recreation. I would also like to know about other recreations groups, invironmental impacts my recreation may effect so I can accommodate the needs of other recreation, or groups. I wish to keep my pivaledge to enjoy OHV activities with balance, in mind.
I enjoy single track trails primarily ranging from easy to expert terrain. I ride designated trails but at times find it difficult to determine wither I am encroatching on other groups activity areas. I enjoy the entire Pine nut Range.
Thank you for your interest in my input and will stay in touch. I look forward to receiving information from B.L.M and is eager to share the info with my groups of the same interest on line.
feel that it is unnecessary to even think about closing public land. No harm is done by riding or just playing in the dessert. Things should just stay the way they are.
1. Kill off foxtails, please. They are extremely damaging to dogs.

Table C-4
General Comments Related to the RMP

My anecdotal tales: While mountain biking on two separate occasions, co-riders broke (a) leg in two places and (b)ankle. In (a), Care flight could not land after arriving on scene (too many trees on steep slope) the first aid to arrive was by private ATV riders! Followed by 4WD trucks and eventually an ambulance. In (b) I was able to ride back to our parking spot and return via 4WD truck.
3. Law enforcement. It upsets me that BLM does not tackle known problem areas-either alone or in conjunction with the appropriate sheriffs office-regarding illegal dumping and shooters leaving behind their shot-up targets and trash (yes, I realize BML- I we so did tackle once such area recently). Example area: Reno, Double-Diamond vicinity, there is a popular shooting area north of Savehill gun club to the east of the electrical substation. On any given weekend one will find dozens of shooters leaving behind trash. Currently there are many (sentence cut-off at the bottom; refer to comment letter).
I believe in conservation to the point that it is necessary, off road enthusiast really do not cause a resource concern. The rules that are already in effect keep people on developed trails, in my experience. This is withheld but there are always going to be people who break the rules.
Also, OHV enthusiasts don't cause any more range degradation than the "Feral horses". I have seen many occasions of the destruction of this invasive species
So all in all I don't think spending more tax dollars on "management" is necessary.
Thank you for the opportunity to add my thoughts and comments to the new Resource Management Plan for Carson City. I am a resident of California and have always loved the outdoors and wildlife, especially our Wild Horses and Burros. I value these Wild Herds and wish to see that they are given the protection and respect that they deserve. I urge that a new RMP include the following tenets:
Please do read Craig Downer's most recent book, WILD HORSE CONSPIRACY. He has solutions that should be seriously considered. This is an excerpt from Craig's book courtesy of Canadian Horse Defence Coalition Though restorers of the continent's ecosystem, they have been unfairly targeted for elimination. Over the centuries, they have borne our burdens and helped us along life's way-which makes it doubly unfair that they should be blamed for what we humans have done. As always, they stand ready to help us do the hard work now so desperately needed to restore our shared home. Many of the author's personal experiences with these animals, their diverse herd areas, and the multicolored people involved with them are herein vividly shared. Urgently required now at the 40th anniversary of the Wild Free-Roaming Horses and Burros Act is a strategy to reverse the negative schemes that are causing their demise in the wild. As described, Reserve Design provides a way for establishing self-stabilizing populations through intelligent and caring programs executed with enthusiasm.
Wild Horses and Burros contribute richly to the natural ecosystem by virtue of their unique digestive systems. I quote Craig Downer, Wildlife Ecologist: This includes increased soil building and increased humus from feces, leading to more nutrient-rich and water retentive soils, and to increased native seed dispersal from an increased variety of native plant species. Indeed, the wild equids are regenerators of the ecosystem, natural gardeners, and Johnny Appleseeds in their own right (See Downer, 2012).

Table C-4
General Comments Related to the RMP

Fire Prevention

Wild Horses and Burros should be partnered with Smokey Bear when it comes to wildfire prevention on public lands. Here, again, I quote Craig Downer, who has made a lifetime study of these wonderful animals:

Their post-gastric digestive system is better able to handle dry, coarse vegetation and to process this without over-expending metabolic energy and to leave less degraded humus to enrich and build the soils, and make them more water-retentive (in relation to ruminant grazers, i.e. the rest). The broad-roaming habit of wild horses and burros also lends itself to their role as preventers of catastrophic fires. Also, they disperse more viable seeds of a greater variety of species in their ample movements over their large home ranges. All this and more makes them fire-preventers or minimizers par excellence!

Good range management should include:

RANGE MANAGEMENT/ DATA
All forage allocations (AUMs) within the Herd Management Area should be included in the range-management data.

Monitoring which distinguishes between Wild Horse impacts as compared to grazing livestock and other wildlife impacts on range resources.

Water usage should be clearly defined and FAIRLY allocated

Maps and analyses which clearly show impacts on Wild Horses and/or Wild Burros caused by any and all commercial usage of public lands within the HMAs.

Full disclosure of all cattle guards in the Herd Management area.
Any and all cattle guards should be either removed or fitted with Wild Horse Annie cattle guards which are specifically designed so as to be safe for Horses and Burros to cross.

Commercial usage of public lands should not receive the lions share of water resources. Wildlife, including wild horses and burros, should receive adequate allocations.

Table C-4
General Comments Related to the RMP

Wild Horse Data: Documentation of Herd population count/census numbers which includes a complete demographic breakdown of Wild Horses in each of the Herd Management Areas
Number of Bands
Stallions/Mares ratios, which should be at a more natural ratio of 50/50
Foals
Yearling
3 Year Olds
Scientific data should be included and show the impacts of sex ratio skewing on the social/behavioral dynamics of the Wild Herds
Removal of fencing
These Wild Herds must be allowed to follow their natural grazing/migration patterns, to the degree possible. They also must be allowed to intermingle in order to maintain a viable and robust gene pool.
Predator protection
This is the natural way of population control, and these Public Lands/Herd Management Areas are, after all, wildlife areas, and should remain as such.
Prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PSP fertility control (if necessary) and protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues.

Table C-4
General Comments Related to the RMP

Stallions should NOT be castrated. There is NO role for geldings in a Wild Herd.
Sex/ratio skewing

Scientific data to show the impacts of sex ratio skewing on the social/behavioral dynamics of the Wild Herds needs to be included and carefully considered. Applied Animal Behavior Science Immunocontraception decreases group fidelity in a feral horse population during the non-breeding season (see citation in list of references)

Contracepted mares both receive and initiate more instances of reproductive interest than do control mares. Reproductive behavior is energetically costly (Galimberti et al., 2000). Repeated bouts of male harassment have been shown to reduce total time foraging in equid species (Rubenstein. 1986; Sundaresan et al., 2007). The relative cost of such behaviors may be especially high during post-breeding season when resources are scarce (Stevens, 1990). In addition, the costs of this behavior may outweigh the potential benefits, i.e. increased reproductive success. Gestation in wild horses lasts approximately 11-12 months (Asa, 2002). Offspring conceived during the winter months are therefore subject to higher mortality due to the cold temperatures and poor quality forages available at birth.

5. Conclusion
In this study, mares contracepted with PZP behaved differently from control mares. They changed groups more often, visited more groups, and both exhibited and initiated more reproductive interest. These differences in behavior have the potential to adversely affect the stability not only of individual harems, but the entire population on Shackelford Banks, North Carolina. Additional study into the mechanism behind these behavioral differences and into the scheduling of PZP administration will help amellorate these effects.

I have read many of the studies done by those who have put years of research into understanding Wild Equine reproduction, herd behavior and herd dynamics. I have learned this much... WE NEED TO LEARN MORE. I've come to the conclusion that the best management is minimal management accompanied by continual and careful observation, as mandated by Federal Law.

Table C-4
General Comments Related to the RMP

Wild Burros

It is imperative that Wild Burros be included in this RMP and Nevada is fortunate to have them. They should be treasured and protected.

This species is endangered and clearly listed as endangered where found. The Endangered Species Act does not make any reference to exclude species that may or may not be found on other than a historical country or area- this this includes the United States of America and the State of Nevada.

The following link is published by the U.S. Fish and Wildlife Service species profile:
http://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=A00M

Kingdom: Animalia
Class: Mammalia
Order: Perissodactyla
Family: Equidae
Listing Status: ENDANGERED
Where Listed: WHEREVER FOUND

The BLM has been given the responsibility to protect the Public's Wild Horses and Burros on public lands as mandated by the Free Roaming Wild Horses and Burros Act of 1971. That is the Law. This is the beginning of a new century. As we move forward, we must save that which cannot be replaced. We can and must learn so much from these Wild Herds. I have been around Horses most of my life, but I never had the opportunity to see how they interact when in their own surroundings, without the interference of Man. There was SO MUCH that I never knew. There is so much more to learn... how they work with their Families... how the Lead Mare often runs the show... how the Band Stallion earns his right to be a leader and reproduce. He has to PROVE his worth and earn his place in the genetic lineage of Wild Horses.

I'll leave you with this information from Karen Suesman, president of ISPMB (INTERNATIONAL SOCIETY FOR THE PROTECTION OF MUSTANGS AND BURROS). This is one of the oldest and most respected Wild Horse and Burro organizations in the country. It was founded in 1960.

The current removal methods have destroyed the horses' social structure, which have resulted in a severe lack of modeling to younger horses by the older and wiser horses. This has happened by younger and younger stallions taking over harem bands. The best analogy is that the Harvard professors are no longer in charge of harems which have given way to younger stallions, who are the equivalent of grde school children.

We also believe that the future of the herds on public land is at great risk for survival over the long term because of the breakdown in their educational system though the destruction of their social harems.

Table C-4
General Comments Related to the RMP

And then there is this article, done by a man who, upon his first glimpse of Wild Horses in Nevada said this: http://www.hoofrehab.com/wild_horses.htm After all these years, my family and I made our first trip to see the wild horses of the United States... So, I walked into wild horse country thinking that I was on a tourist trip; confirming what I already knew. I could not have been more blind. I could not have been more wrong. They were much, much more than I had ever imagined. What I write here, will probably sound very similar to what my predecessors have written. I don't know if anyone's words can get the point across to the world, but I have to try. I thought I was ready, but what I saw literally blew me away. I have worked on thousands of horses, all over the world. I spent six years of my life in the saddle from daylight till dark. I've had the privilege of working on some of the finest horses, for the finest horsemen in the world. Understand that after two minutes with the wild ones, I knew that I had never seen a true horse. I literally had no idea of their potential. The country was solid rock; mostly baseball-sized porous, volcanic rock that you could literally use as a rasp to work a hoof if you wanted to. Every foot or so, a basketball sized rock was thrown in for good measure.... How has the world ignored the remarkable lessons the natural horse has to offer us? Only a few people have noticed them and very little time has been spent studying them. The true wild horse is an endangered species, because true wild horse country is almost gone. We had better learn to treat them as such and get all of the answers we can from them before it's too late.
I encourage the BLM to grant permits to allow off-highway vehicle organized events in the Pine Nut Range. In the past there have there have been motorcycle "endurd" trail rides, one at the east end of Johnson Lane, and another based out of Dayton Fairgrounds. These "Wild Horse" and "Wild Pony" endurd trail rides are a great way to recreate responsibly on BLM designated roads and trails, and provide a legitimate use of this public land. An economic benefit is also derived by local businesses. Please allow these events to continue.
I feel that there is too much removal of our wild horses. Livestock owners should keep their livestock on their private land. This would solve a lot of problems.
The Nevada WAP serves as a comprehensive, landscape level plan, identifying the species of greatest conservation need and the key habitats on which they depend, with the intent to prevent wildlife species from becoming threatened or endangered. The WAP contains a conservation strategy to provide guidance to successfully conserve Nevada's key habitats and priority species. This conservation strategy has been appropriately manage spring and riparian resources as these areas are especially important to wildlife.
Game Management NDOW is a Cooperating Agency in the Greater Sage-grouse EIS. We will defer comments at this time but will continue to participate in that process.

Table C-4
General Comments Related to the RMP

The biggest problem in "managing" public lands is keeping them public and not trashed by energy companies, developers, cattleman, etc. with the big money to hire lobbeys who add riders on to bills allowing the trashing to continue. This is how the wild horse issue has become so dire. The horses are supposed to be "free ranging" and the BLM has be packed with special interest people who want the land the wild horses live on so they are no longer "free ranging", rather, kept like zoo animals in designated areas by killing, rounding up and penning, etc, in order to give their land to the people who pay congress to add those nasty riders on to bills that allow this mismanagement to continue. The word is getting out when we all see how the wild horses are being trashed by the corrupt BLM and the fight has just begun to return these horses their free ranging status as originally intended. The BLM doesn't round up deer, elk, antelope, etc. and put them in pens... neither should they round up horses.
I just came across your questionnaire at the entrance of Pah Rah Canyon today, and although the deadline for comment has passed, I would nevertheless like to offer the following:
My family and I have enjoyed Pah Rah Canyon and Canoe Hill for many years. We have carried out much litter. I wrote to you several years ago and was told the area would be protected from development. I am thankful to see that this has been the case. I am also very pleased to note that you are considering maintaining the trail. It may not be apparent from public comment, but it is clear that many walkers and mountain bikers enjoy the area and use it responsibly
I note that construction of a footpath up the picturesque side canyon up the east (back) side of Canoe Hill has commenced. I do not know if this is a BLM project. Before the burnout some years ago, this canyon was a great winter gathering place for Mountain Blue Birds, so my family name for the canyon has always been Blue Bird Canyon. If completed, the path will intersect the unobtrusive mountain bike trail that crosses the cliffs at the head of the canyon, giving access to the top of Canoe Hill, as well as to Spanish Springs, via the mountain bike trail..
As you may have noticed, the Sparks side of Canoe Hill is being defaced by off roading. Perhaps a vehicle trail is inevitable on this highly visible landmark, but I wonder if you would find it feasible to designate a single trail, with signage, as I believe was done with some success on Peavine. Perhaps users could be encouraged to use only the back (east) approach. Ialso note that occasionally, people dump large appliances and tires atop Canoe Hill. There was a deposit there a few weeks ago. I do not have the equipment or strength to take such things out. There seem to be relatively few abusers, and periodic pickup would probably keep us abreast of the problem. There is considerably more abuse on the Sparks side of Canoe Hill (above the water tank); at least it is generally concentrated out of sight.

ISSUE 1. RESTORING ECOLOGICAL HEALTH

Table C-5
Restoring Ecological Health

General comment related to biological resources
Global warming's well-established impacts on resources including air quality, water quality, and imperiled plants and animals will combine with and exacerbate the direct, indirect, and cumulative impacts of management actions and land use activities such as motorized recreation. At a minimum, a description of the effects of climate change on existing conditions such as the prevalence of exotic plant species, important habitat for wildlife and habitat connectivity, the availability of water and the health of riparian areas, zones of soil erosion or vulnerability to erosion, all provide critical baseline information necessary for the BLM to determine whether public land resources can withstand any of the proposed management alternatives. Without this basic foundational information about the existing impacts of climate change on the land, and future expected impacts, it is impossible to make informed decisions about the level, location, and kind of activities the land and its ecosystems can support in the future.

Table C-5
Restoring Ecological Health

- Areas Identified as "Important Bird Areas" ("IBA")

Important Bird Areas, or IBAs, are sites that have been identified under the auspicious of the Audubon Society that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. IBAs may be a few acres or thousands of acres, but usually they are discrete sites that stand out from the surrounding landscape.

To qualify as an Important Bird Area, sites must satisfy at least one of the following criteria. The site must support:
o Species of conservation concern (e.g. threatened and endangered species)
o Restricted-ranges species (species vulnerable because they are not widely distributed)
o Species that are vulnerable because their populations are concentrated in one general habitat type or biome
o Species, or groups of similar species (such as waterfowl or shorebirds), that are vulnerable because they occur at high densities due to their congregatory behavior

Identification of a site as an IBA indicates its unique importance for birds. The IBA identification process provides a data-driven means for cataloging the most important sites for birds throughout the country and the world. The use of a hierarchical classification system further helps to establish priorities for conservation efforts.3

On the CCDS there are at least five IBAs that have been identified and recognized as important at the state level:
o Lahontan Valley Wetlands IBA
o Carson River Delta IBA
o Swan Lake IBA
o Walker Lake IBA
o Mount Grant IBA

For a detailed description of the sites, their valued and unique features and the factors threatening them, refer to the Audubon website at: http://iba.audubon.org/iba/siteSearch.do .
Many land uses may be compatible with recognition of an ACEC designed to protect the vulnerable features of a particular IBA, and the primary focus should be on maintaining the integrity and function of the area.

All ACECs should have surface occupancy and mineral rights withdrawn, and federal water rights protected to ensure their integrity and site characteristics.

3 For further information, see: http://web4.audubon.org/bird/iba/iba_intro.html

Table C-5
Restoring Ecological Health

Please accept the following comments into scoping for the Carson District RMP planning process.

I am an avid outdoors-man, and the lifestyle myself and my family choose to live is one of spending all free time in the great outdoors. This may be camping, hunting, fishing, hiking and especially riding our dirt bikes. This is especially critical to me personally and financial stability of my family, because I manufacture high end aftermarket motorcycle parts and accessories. We view every weekend as a time to get outdoors which makes our family bond stronger. We have three small daughters and they love learning about, and being out in the vastness of our state.

6. Transportation Planning and Off-road Vehicle Recreation

Travel planning requires the agency to manage human travel across the landscape. The land use planning process, which addresses the broader landscape within a planning area, provides one of the best opportunities to make travel planning decisions in the appropriate context. The placement and design of travel routes defines which areas will remain or become roadless, whether they will maintain or become of Wilderness character, and which areas will be disturbed and how. In other words, route decisions determine the fragmentation of the landscape, and, thus, how naturally or unnaturally a landscape will behave in terms of water flow and quality, wildlife migration, and species composition and function.

Past Environmental Assessments for removals of wild horses in this district indicate a unique knowledge of these animals among CCD preparers; characteristics, appearance and history are nearly always a component of EA's authored by this district. Not all districts do; this indicates to me that CCD possesses a working knowledge of these animals - their ancestry, perhaps even their habits. Field study of the herds and their grazing habits, forage preferences and individual herd growth rates are essential - as opposed to range studies, which attempt to seek out a primary causal factor of degradation. This specialized familiarity within HMAs could be beneficial first, in determining a viable, reasonable and accurate growth rate among particular herds, then in assessing which forage and water sources are being utilized (or over-utilized). In published Herd Statistics, a very limited number of HMAs throughout the BLM shows that some herds left minimally disturbed, while they do exceed AML, remain relatively small and stable, even over the long term - evidence that self-regulation of a herd is a possibility. Assignment of a particular HMA for study exclusive to the herd within it - perhaps on a seasonal basis - will provide a more thorough understanding of the animals and their environs. And in the event removals become necessary, the removals can be selective rather than contingent on a high percentage, as so many have become.

NEPA PROCESS
9. ISSUE: Private and foreign contract military personnel operate without NEPA or permitting.
I recently had a conversation with a packer who rented mules to a military entity for specialized troop training (mules are used in Afghanistan). The animals were being used in the south central portion of the CCDO. That area has already seen desert bighorn guzzlers used as ambush blinds in "military" games. Public users have been stopped by "military" personnel on public lands roads. Private, for-hire contract military personnel use CCDO to train private troops / security personnel. Private contract military personnel have been in CCDO to discuss use of public lands, but their activities were never analyzed, no stipulations / mitigation given and no permit for use issued.
The use of wildlife guzzlers is one example of potential impacts. Sportsmen's groups, the state and the BLM have spent thousands of dollars on bighorn guzzlers in order to try to maintain this native species. If bighorn are disallowed the ability to drink or are conditioned to avoid guzzlers or even shot at, an American resource is being damaged. If a mule pack train travels through a bighorn lambing ground or sage grouse lek, these activities could be impacted. The extent of this issue is unknown because the activity hasn't been analyzed. In New Mexico, the USFS has put Air Force PJ training under a special use permit that has worked for all concerned. If they can do it, certainly CCDO can do it for private military people who are simply public land users.

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BLM must apply a legal definition of "road" within the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and in fact, close and reclaim such "ghost roads." Some legal roads serve important travel needs and are appropriate for motorized use. However, routes that are not "roads" should not receive equal consideration. The agency has a definition of "road," and this definition should be adopted and used consistently in order to create a regular expectation and approach on BLM public lands. We note however, that merely meeting the definition of a road is not sufficient to justify designating a route. In fact, the BLM must still consider whether a route has negative impacts to sensitive or protected resources, such as by the process recommended in this document, and should only designate those that do not impact these resources. The legal definition of road for the BLM public lands is derived from the definition of "roadless" in the legislative history of FLPMA: The word "roadless" refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road. (H.R. Rep. No. 94-1163 at 17 (1976)).
Wild Horses and Burros Friends of Nevada Wilderness is committed to protecting Nevada's wilderness study areas and other lands with wilderness character. We are also concerned about the health of wild horses, wildlife and their habitats. When horse numbers increase above levels the land can support, wilderness values can suffer as can overall health of our public lands. When horse numbers reach unsustainable levels, we are not only concerned about damage to the sagebrush community and competition with native wildlife such as sage-grouse, but we are also very much concerned about the current and future health of the horses themselves. Because wild horses in Nevada have no natural predators, we understand that active management can be necessary to maintain the herds at humanely sustainable levels, without destroying the land that sustains them. We support the RMP making decisions that will keep both our wild horses healthy and our public lands and wildlife healthy.
Other benefits: Prevent migratory bird, bat and small animal deaths from drowning. Promote recreational uses and human health - benefits also include cleaner non-polluted water, reduction in potential hoof-pocked riparian margin sites that serve as breeding areas for West Nile mosquitoes. Promote persistence of perennial surface water flows. Buffer natural systems from adverse impacts of desertification and climate change. Active restoration: Ripping/recontouring of roads and seeding with native local ecotypes of shrubs and grasses. Many roads on wild public lands were unplanned, and simply were driven in as livestock facilities and salting/supplement feeding proliferated. With rollbacks in the infrastructure footprint many of these can be removed and rehabbed to limit weed spread and provide greater habitat security.
Active restoration may also require seeding with natives in areas of more livestock intensive use/weedlands caused by livestock concentrations. This should not result in removal of shrubs. Any removal of trees (where present) must only include younger age class trees only – and must only be conducted with selective hand cutting leaving trees and branches on-site. This minimizes weed expansion risk, and helps to moderate site conditions by trapping snow, shading ground surfaces, protects soil surfaces, minimizes disturbance to microbiotic crusts, and provides safe sites for establishment of native understory species. Benefits of these above actions MUST be planned in concert with changes, reductions, orcessation in grazing to promote: Recovery of composition, function and structure of sagebrush ecosystem components; Reduction in elevated perches for nest and egg predators and decrease in facilities and activities that promote nest and egg predators; Removal of disturbance epicenters of weed infestation and spread; Removal of facilities and conditions promoting West Nile virus.

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Of primary concern are the impacts of renewable energy projects on listed, candidate and other imperiled species.

The majority of the plans of development for solar projects to date have called for mass grading and/or vegetative clearance from the project site. Obviously this causes a horrific toll on the plants and animals residing on the site. Unfortunately, the same terrain characteristics favored by many species of concern are likewise the primary target area for solar and wind energy projects.

Executive Order (EO) 11644, as amended by EO 11989 provides clear and explicit direction to the BLM regarding the use of off-road vehicles (ORVs) on the public lands.

The purpose of these EOs is to, "ensure that the use of ORVs on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands."

Section 3 of the EOs speaks to the designation of areas and trails such that: damage to soil watershed, vegetation or other resources; harassment or disruption of wildlife habitats; and conflicts between ORV use and other uses of the federal lands; are minimized.

Section 9 of EO 11989 states:
"Special Protection of the Public Lands.
(a) Notwithstanding the provisions of Section 3 of this Order, the respective agency head shall, whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effects, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence.
(b) Each respective agency head is authorized to adopt the policy that portions of the public lands within his jurisdiction shall be closed to use by off-road vehicles except those areas or trails which are suitable and specifically designated as open to such use pursuant to Section 3 of this Order."(emphasis added).

In its analysis, the BLM must provide a thorough and comprehensive analysis of the effects and impacts from the motorized recreation currently on-going on the district as outlined in the EOs. The Center feels that the current level and type of motorized uses are resulting in significant damage to soils, desert vegetation and springs, as well as causing significant harassment and disruption of wildlife, including listed species or candidate species such as sage grouse.

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2. Comments on Issue 1 as identified on the issues webpage "Restoring Ecological Health"
BRC recommends against adopting this issue as a "significant planning issue." The term "ecological health" is not sufficiently defined nor is the reasons why the "ecological health" needs to be "restored." Also, managing for "restoration of ecological health" is not included and, depending on its definition, may be in conflict with the agency's MUSY mandate.

Because "ecological health" and "restoration" is not sufficiently defined in BLM's materials, incorporating this issue as a Significant Planning Issue will require the agency to provide additional opportunity for public input in order to comply with mandates requiring meaningful public input when formulating land use plans.

We do not mean to assert that rangelands and other areas within the CCDO do not need to be managed in order to address activities that have had, or have the potential to have, significant adverse impacts. Nor do we want to assert that healthy (restored?) rangelands cannot be part of the rangeland and/or vegetation objectives contained in the draft RMP. But doing so is a mandate already placed on the agency and must be considered at every level of planning. Therefore, this issue is redundant, and may lead to an unlawful and unwise narrowing of Alternatives and the Decision, as well as a diminishing of the MUSY mandate placed on the agency. (Please see our comments in Section C.)

Finally, if the agency unwisely adopts this as a Significant Planning Issue and attempts to develop Alternatives to address it, all components of the terms "ecological health" and "restoration" must be well defined in the DEIS and the analysis.

Soil / Water / Air / Visual Resources
We believe that resource protection is compatible with a system of routes that keeps our public lands open, accessible and usable for recreation and economic benefit.

Wild horses and burros are also important to wild ecosystems, because horses evolved in north american and continue to contribute to the ecosystems in positive ways. My family enjoyed seeing the wild horse fossils at the hagerman fossil beds, for example. Ecological research shows that buffalo in north america function differently than cattle in ecosystems and the same for zebra in africa compared with other large herbivores. Each animal contributes to the ecosystem it is developed to be in. In the same way the natural expansion of wolves back into their traditional roles benefits ecosystems as well and promotes a wider variety of species and more balanced numbers. I am sorry i don't know if wolves are one of the predators native to all of nevada, but having wild horses and burros is complementary to the natural nevadan predators while having cattle usually works to the predators detriment and thereby damages the whole ecological balance.

Wild Horses and Burros contribute richly to the natural ecosystem by virtue of their unique digestive systems. I quote Craig Downer, Wildlife Ecologist:

This includes increased soil building and increased humus from feces, leading to more nutrient-rich and water retentive soils, and to increased native seed dispersal from an increased variety of native plant species. Indeed, the wild equids are regenerators of the ecosystem, natural gardeners, and Johnny Appleseeds in their own right (See Downer, 2012).

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Predator Killing on Public Land Managed by BLM: All killing of natural predators on public land managed by BLM must be stopped immediately. Every year, USDA Wildlife Services kills large numbers of birds and mammals across the United States to protect livestock and other resources including 450,347 animals in Nevada alone between the years of 2006-2011. This is an atrocious waste of federal resources done completely for the livestock stakeholders, not to mention this killing is a cruel and inhumane destruction of America's wildlife. Read more here: http://www.sacbee.com/2012/04/28/4448951/interactive-graphic-animals-killed.html#storylink=cpy http://www.sacbee.com/2012/04/28/4450678/the-killing-agency-wildlife-services.html http://www.sacbee.com/2012/04/28/4448951/interactive-graphic-animals-killed.html http://www.sacbee.com/2012/04/28/4450686/ex-trapper-leg-hold-device-probably.html
We encourage the Wild Horse Management program to manage populations within the Appropriate Management Level (AML) to meet a "thriving natural ecological balance" as is described in the 1971 Wild Horse and Burro Acts and is provided for in further BLM policy and guidance. We encourage the CCD to make a strong commitment in the RMP to adequately monitor wild horse and burro body score conditions, population numbers, rangeland forage conditions, and riparian and spring conditions among other monitoring procedures, basing management decisions on monitoring data. As monitoring data indicates, timely gathers should be conducted to remove excess animals including all animals outside of HMA boundaries. Additionally, NDOW supports BLM's effort to utilize the full range of management tools at their disposal to ensure that horse and burro numbers are maintained in balance with other resources such as wildlife. These tools include but are not limited to the use of removal gathers, sex ratio skewing, fertility control, chemical or surgical sterilization, adoption, non-reproducing herds, etc. We request that a strong commitment towards monitoring occur, supported by timely management actions that addresses management issues. For example, if wild horse numbers are within AML and rangeland resource impacts (e.g. spring monitoring) are occurring by wild horses as indicated through rangeland monitoring efforts, we encourage adjusting AML as necessary to meet a "thriving natural ecological balance" and immediately removing excess horses to the adjusted AML so that resource impacts are minimized. Furthermore, we encourage taking appropriate actions (e.g. re-seeding, excluding animals from an area, etc.) to repair resource damage.

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Wild and Prescribed Fire, Fuels Management, and Emergency Stabilization and Rehabilitation (ES&R) NDOW recommends wild and prescribed fire, fuels, and ES&R (collectively termed Fire Program) focus on managing for rangeland health and integrity. We recognize that decisions must be made with limited resources in regards to prioritizing suppression, fuels management, and rehabilitations efforts. NDOW encourages the CCD to model travel management plan addressing OHV issues. Items we recommend addressing in the travel management plan include: 1. Permanent Road Closures: We support the closure of duplicate destination roads, no longer used mine exploration grid roads, and mitigation of resource impacting or degrading routes. Increased road densities have been proven to impact wildlife through habitat loss and fragmentation, increased stress levels demanding higher energy requirements, and direct mortality. We encourage closed roads to be reclaimed. We discourage the elimination of sole source access that provides a road option for wildlife recreationists. 2. Temporary Road Closure/Seasonal Restriction: We encourage temporary seasonal restrictions to occur on roads to avoid wildlife resource impacts. For example, seasonal restrictions should occur in crucial mule deer winter ranges during the winter season to lessen stress. 3. Overland travel and unauthorized user-created roads: We understand and support the need to control the ever expanding network of new trails created by individuals into areas without roads. We recognize the resource damage that can occur and are willing to cooperatively work with the CCD to prevent its occurrence. 4. Game Retrieval: We support allowing challenged hunters the opportunity for game retrieval. 5. Signage: NDOW suggests marking "closed" roads as such and leaving "open" roads un-marked. Signage is a direct way to inform users of closure and is not dependent upon the individual having a travel management map in their possession. 6. Law Enforcement: We encourage increased law enforcement activities to address unauthorized use. Additionally, we encourage unauthorized use reporting. Furthermore, a coordinated process should be developed jointly by NDOW and the BLM as it is our expectation that the majority of the violations will be documented by NDOW wardens who have no enforcement authority over federal regulation pertaining to travel restrictions. 7. Education: We encourage educating the public and OHV user groups about the potential wildlife impacts that are associated with unauthorized travel. We also encourage working cooperatively with OHV groups to build trust, ensuring participation and increasing unauthorized use reporting.
Restoration Actions - Both Active and Passive \Passive restoration: Removal or very significant reduction of livestock grazing use to levels far below actual use. Removal or very significant reduction in facility fragmentation and intrusion footprint, and also the management disturbance footprint on the landscape. Removal of these livestock grazing associated disturbances must occur so that the composition, function and structure of the components of the native sagebrush ecosystem can recover before weeds choke out remaining sagebrush understories. Access road closures and/or greatly limiting road blading disturbances helps prevent weed invasion and outward spread so that natural recovery may occur. Active restoration: Removal of fences to reduce avian mortality; to reduce intensive disturbance zones; to reduce predator travel corridors; to reduce nest predator perches; to reduce brood parasite perches; to reduce habitat fragmentation. Active restoration: Removal of livestock water troughs, pipelines, spring developments and wells to reduce livestock disturbance to surrounding soils, microbioticcrusts, and native vegetation and to promote the health and passive recovery of all components of the sagebrush ecosystem
Where are habitat improvement projects appropriate? What kinds of improvement projects are feasible? Water access. Removal of invasive plants.

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Vegetation-General
10. Pinyon-juniper Restoration Projects The Center acknowledges that there is ample scientific evidence to support the hypothesis that pinyon-juniper ("PJ") woodlands have expanded from that present in the absence of peoples of European heritage. 24 We have observed and are concerned that in the rush to "convert" PJ back to grass and shrublands, ecologically stable areas of old-growth PJ are being lost to the detriment of the ecological integrity of the landscape. We refer you to a publication by William Romme and fifteen other scientists, that discusses the differentiation of stable PJ from that which has been invasive.25 As a forest ecologist myself, I have observed that utilizing the Tausch guidelines can lead to unwarranted destruction of stable, old growth PJ. The Center urges you to safeguard the legacy of stable, old growth PJ stands while the BLM attempts to restore pre-settlement vegetation patterns on the landscape 24 Swetnam, Thomas W., Craig D. Allen, and Julio L. Betancourt. 1999. Applied historical ecology: using the past to manage for the future. Ecological Applications, 9(4):1189-1206. Tausch, R.J., R.F. Miller, B.A. Roundy, and J.C. Chambers. Undated. Piñon and Juniper Field Guide: Asking the Right Questions to Select Appropriate Management Actions. U.S. Dept of Interior, Geologic Service Circular 1335. 108 pages. 25 Romme, William H., Craig D. Allen, John D. Bailey, William L. Baker, Brandon T. Bestelmeyer, Peter M. Brown, Karen S. Eisenhart, Lisa Floyd-Hanna, David W. Huffman, Brian F. Jacobs, Richard F. Miller, Esteban H. Muldavin, Thomas W. Swetnam, Robin J. Tausch, and Peter J. Weisberg. 2008. Historical and Modern Disturbance Regimes, Stand Structures, and Landscape Dynamics in Pinon-Juniper Vegetation of the Western U.S. Colorado State University, Fort Collins, CO. 37 pages.
· Habitat Destruction (Fleischner, 1994) (Wilcove, Rothstein, Dubow, Phillips, Losos, 1998) (Belsky, Matzke, Uselman, 1999) (Donahue, 1999) (Wuerthner, Matteson, 2002)
7.) Habitat improvement project. Horses and burros have a tendency to impact riparian areas, such as spring, meadows and streams in certain location. These areas are typically very important areas to wildlife and for livestock grazing. The CCDO should evaluate these areas to determine if horses/burros should be excluded with horse proof fencing. The CCDO consider using exclusion fencing on some of the important spring sources in the Desatoya and Clan Alpine Mountains, including areas in the WSA's. In some of the HMA, pinyon-juniper tree cover is reducing potential forage. Possible improvement project to increase forage production would include PJ removal and in some location crested wheatgrass seedings. Also installing seedings could be used to change the distribution of animals, and could be used as a possible way to keep animals out of urban interface. In the Pine Nut Mountains there are several old seedings (Sunrise Pass) area that are in need of some brush removal. With some brush removal forage production could be increased. Would recommend looking at additional tree removal projects in the Pine Nut Mountains to open more habitats.
LIVESTOCK GRAZING 3. ISSUE: Requests have been made for livestock grazing on Winter's Ranch. Winter's Ranch is an open space area in Washoe Valley that is presently recovering from 100 + years of private use by man and overuse by livestock. Willows have returned to areas of the Ranch that were bare as have many other native dry meadow species of vegetation. There have been requests to graze the area

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Off-Road Vehicles -- Off-Limits in HAs and HMAs Off-road vehicles should be prohibited in HAs and HMAs. ORVs are notorious for their damaging effects on range conditions, creating soil and vegetation disturbances and probably spreading weeds. They also disturb the peace and could be used to chase and harass the wild horses and burros.
If wildfires occur, removal of livestock for a minimum of 7-10 years must be required. Specific recovery criteria for native grasses, forbs, shrubs and microbiotic crusts must be applied and attained before grazing can again resume. Following any fires, re-seeding rehab will only use native species, will use local native ecotypes, and will mimic natural spacing patterns - i.e. dense wheat field like seedings of tall coarse cultivars will not occur. Following any fires, rehab will not result in building temporary or other fences. Instead, grazing will be removed from the pasture and/or allotment in order to provide undisturbed habitat and buffer conditions for species just suffering new habitat loss.
BLM must also apply criteria that determine if damaged areas -such as springs, seeps, intermittent drainages, damaged headcutting streams, sagebrush uplands highly vulnerable to cheatgrass spread and other areas can withstand any continued grazing disturbance. Mitigation by avoidance must be conducted - and it must involve pulling livestock use back to existing pastures, not carving the landscape up into even more pastures.
Exotic Seeding Reclamation/Restoration Active restoration of crested wheatgrass seedings must be conducted through: >inter-seeding of sagebrush and forbs. >removal of CWG with techniques minimizing use of herbicides Active restoration of cheatgrass infestation areas without loss of shrubs cover to the maximum extent possible. In all cases of seeding - local native plant ecotype seeds and seedlings must be used. By far the cheapest and most cost-effective method to recover and restore plant communities is to remove livestock grazing and trampling disturbance from those communities that have not yet undergone significant weed invasion. These communities will be buffered to help limit weed infestations. This will also maximize site resiliency if fires occur, and understories will be in better condition and more readily able to heal. It is unrealistic to think that BLM can prevent wild land fires, and methods often proposed by the agency have significant adverse impacts -ranging from planting aggressive weedy species to promoting more cheatgrass through removal of shrubs which results in a hotter, drier, more fire and cheatgrass-prone site with a longer fire season.
BLM must also apply shrub protection standards, and require shrub structural integrity standards. No sagebrush plants or other shrubs anywhere in the pasture should receive more than 5% breakage or other impacts. All of these standards must be applied as triggers for immediate removal of livestock from the pasture. If the use level is reached, the livestock must be moved out. If any of these standards are exceeded in any year, livestock reductions in numbers will be put in place - with reductions of 25-50% for each violation along with more herding and other requirements. If ranchers are unable to meet these standards, they are unable to control their livestock, so the herd size is too large. If standards are exceeded in multiple years, livestock grazing must be ended in the pasture. Salt and especially supplement will not be used. Livestock trailing to salting/feeding sites - and the impacts of concentrated use at these sites - severely alters and reduces native vegetation. These disturbed sites provide centers for cheatgrass, medusahead, and other weeds to spread outward from.
At least 6 inches of stubble height must remain on all riparian/meadow area herbaceous species at all times, including drier sites not right on the greenline. This must be applied to all species- not just Nebraska sedge - and during all periods of livestock use. Riparian shrub browse and/or breakage must be limited to 5% of livestock-accessible new growth.

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Typically, a 10-15% upland utilization must be put in place. It must be measured at sites that are actually used to a significant degree by livestock. BLM cannot apply 30% or 40% utilization –because this is greatly inadequate to prove necessary residual nesting cover (9 inches) and to promote adequate recovery of depleted understories. No matter what size grasses may be present, utilization measured by BLM is averaged across the grass plants that are grazed. So typically, when an area "averages" 40% utilization, this means that many grass plants are grazed to levels of 60-80%. Such use levels - even one time use this severe by livestock- can severely harm or kill native bunchgrass plants by removing growing plant parts and depleting scarce root reserves, as well as by exposing the grass crown to winter freezing damage or summer heat-desiccation. See USDI Technical Bulletin Anderson 1991, Mack and Thompson 1982. There must be no use during active growing periods for native grasses and forbs. It is very difficult if not impossible to accurately measure how much use occurs when plants are grazed while actively growing.
For any remaining grazed lands: The use levels that must be applied leave must 9 inches of residual native grass cover across understory communities. This must be based on the native perennial grasses that are present. It must be based on sites, especially deeper soil sites and sites actually used to a considerable degree by livestock -not on cherry-picked sites distant from water where larger statured grasses may remain in depleted landscapes. Only one grazing disturbance bout can be allowed. Otherwise, "double dipping" -or repeated use occurs which is harmful to sage-grouse and vegetation. Under repeated grazing bouts in the same year, total use may significantly exceed a percentage allowed for one period use - due to plants re-growing between bouts. Trailing should not be allowed back through areas that have been grazed.
BLM must develop a set of site-specific required actions under alternatives that chart a rapid, decisive and clear path forward to ensure protection and restoration(where necessary) of critically important sagebrush, pinyon-juniper, salt desert shrub and other wild land habitats in a landscape undergoing significant invasive species expansion. The benefits of passive restoration (allowing ecosystem components to heal through removal of disturbance and degrading activities) must be fully considered.
Vegetation: BLM's primary responsibility to manage vegetation to support all of the multiple uses of public lands is a critical one. Ensuring the achievement of standards and guidelines for healthy rangelands for the grazing and wild horse and burro programs is a good first step. The RMP should address which allotments and HMAs are meeting these requirements and what actions the BLM is taking to ensure that non-attainment problems are resolved, with specific deadlines for "progress" to be made. Correcting poor management is much more cost-effective than "treatments" to achieve healthy rangelands. The benefits and costs of proposed vegetative treatments should be closely evaluated, especially to sensitive wildlife, in order to avoid the listing of additional species harmed by these projects. Livestock and WH&B numbers and seasons of use should be adjusted in order to achieve requirements for healthy rangelands and to provide adequate habitat for wildlife. Non-native plants should only be used temporarily to stabilize lands disturbed by wildfires or other events until native vegetation can recover. What is the status of vegetation monitoring in the CCD? Is effectiveness monitoring required and implemented on vegetative treatments?
All of this must be applied to protect the values of the sagebrush ecosystem. BLM frequently attributes problems with lands and waters to historic grazing - ignoring that the current chronic grazing disturbance incrementally eats away at the remnants. Grazing prevents or greatly slows "recovery". And even if one were to believe that "historic" grazing caused all the problems one sees on public lands, there are now scientifically recognized new threats. Continued grazing and trampling depletion and disturbance are threats. Grazing causes and/or exacerbates other "threats" that BLM often relies on to brush problems away - like cheatgrass and fire.

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7-n. ISSUE: Most LUP's and the proposed Conservation Measures fail to address needing written vegetation objectives for a specific treatment area. Project specific habitat treatment planning often refers back to generalized objectives outlined in the LUPs such as "improve riparian condition for sage grouse" or "manage woodlands to maintain existing sage grouse habitat". What does improve and manage mean and how do you know when you get there? Specific vegetation objective statements aren't typically written, but would make it is easier to locate treatments area with the highest potential and easier to consider a whole array of treatment strategies. After treatment, one knows if the objective has been met or appears to be going in the right direction. The USFS often uses this approach.
Also, when BLM is reseeding, is BLM using genetically engineered seeds or trees? There are too many unknown effects to the environment to justify using genetically engineered seeds or trees.
Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery.
7-c. ISSUE: The proposed Conservation Measures fail to describe the crucial difference between sagebrush habitats that are in good ecological condition vs. sagebrush habitat in poor ecological condition. All of the recommendations concerning managing or restoring the sagebrush habitat type talk about achieving a minimum 50-70% cover for the sagebrush. Some mention is made of sagebrush communities (the understory), but this is never described adequately, even in the Appendix. There can be two choices of sagebrush habitat and understory. In one choice, native grasses, forbs and other shrubs dominate the remaining 30-50% composition of the understory. In the other choice, the remaining 30-50% is dominated by exotics such as cheat grass, annual weeds, and bare ground. The first can support healthy sage grouse numbers, the other can't. Without explicit descriptions, managers and project proponents can choose to save sagebrush areas that have no value to sage grouse.
3. Livestock Grazing: Today, there is far less livestock on public lands, by design or by cultural change. Years ago, livestock assisted in keeping certain types of flamable brush in control of overgrowth due to their feeding needs. With the lack of livestock being allowed in certain areas, Nevada has experience far more rangeland fires. Because of the influence of environmental extremists of wanting to turn our open lands back into a "natural state", we no longer have what use to be natural fire management.
7-n. ISSUE: Most LUP's and the proposed Conservation Measures fail to address needing written vegetation objectives for a specific treatment area. Project specific habitat treatment planning often refers back to generalized objectives outlined in the LUPs such as "improve riparian condition for sage grouse" or "manage woodlands to maintain existing sage grouse habitat". What does improve and manage mean and how do you know when you get there? Specific vegetation objective statements aren't typically written, but would make it is easier to locate treatments area with the highest potential and easier to consider a whole array of treatment strategies. After treatment, one knows if the objective has been met or appears to be going in the right direction. The USFS often uses this approach.

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7-l. ISSUE : Use of standard NRCS and other vegetation mapping that has too coarse a filter to pick up crucial riparian microsites causing important sage grouse areas in Nevada / CCDO to be ignored Good condition mid-seral and low / early seral vegetation are as important to sage grouse as high / late seral vegetation to supply all of their life cycle needs. However, for example, Natural Resource Conservation Service (NRCS) soil / vegetation mapping has typically been used as a standard for rangeland management in BLM and is recommended in the Conservation Measures. NRCS vegetation typing is done using high / late seral vegetation as the standard. It is generally silent on describing low / early and mid seral vegetation that is important for grouse and important for habitat enhancement objectives. Are we sure that the greatest abundance of forbs and insects needed by sage grouse isn't produced in a good condition / low-early seral vegetation community? By using NRCS descriptions, CCDO will be managing exclusively for high seral vegetation communities. Additionally, references like NRCS don't break out the numerous small acreage riparian areas that are crucial to sage grouse for brood rearing and connectivity habitat in more arid areas. By not considering these aspects, important habitat will be ignored, areas with high potential for enhancement will be passed over and Bi-state sage grouse habitat will ultimately be lost.
Fuels 7-i. ISSUE: The proposed Conservation Measures fail to address post restoration management in sage brush habitat experiencing woodland encroachment. Many contracted woodland treatment areas don't have post treatment in the form of prescribed fire or mechanical treatment for whip removal due to cost and/or a lack of understanding of pinyon-juniper ecology. When the larger trees are cut, it releases the smaller ones and the effect of the woodland on the understory returns within a few years. There is a large body of research and published information supporting this issue.
7- h. ISSUE: The class of cattle permitted in sage grouse habitat has not been discussed in the Conservation Measures and needs to be addressed in the RMP. The class of cow that grazes may be important to sage grouse habitat. Rangeland managers and livestock producers know that cow / calf pairs use a grazing allotment differently than steers, particularly yearlings. Cows tend to remain in gentler topography and nearer water which in Nevada means areas with riparian areas. Stockmen tend to not push pairs into rougher country. Use levels on riparian areas and bottom lands are met quickly - often well ahead of the AMP's "off" date. When this occurs, pairs often remain in the pasture or allotment for a variety of reasons; utilization levels are exceeded, riparian / range conditions change or deteriorate. Conversely, steers will travel farther within an allotment to seek forage and can be pushed into rougher country. Yearling animals exhibit a natural curiosity that helps disperse these animals better and they can be pushed further into rougher country.

Table C-5
Restoring Ecological Health

10. Pinyon-juniper Restoration Projects
The Center acknowledges that there is ample scientific evidence to support the hypothesis that pinyon-juniper ("PJ") woodlands have expanded from that present in the absence of peoples of European heritage. 24 We have observed and are concerned that in the rush to "convert" PJ back to grass and shrublands, ecologically stable areas of old-growth PJ are being lost to the detriment of the ecological integrity of the landscape. We refer you to a publication by William Romme and fifteen other scientists, that discusses the differentiation of stable PJ from that which has been invasive.25 As a forest ecologist myself, I have observed that utilizing the Tausch guidelines can lead to unwarranted destruction of stable, old growth PJ.

The Center urges you to safeguard the legacy of stable, old growth PJ stands while the BLM attempts to restore pre-settlement vegetation patterns on the landscape

24 Swetnam, Thomas W., Craig D. Allen, and Julio L. Betancourt. 1999. Applied historical ecology: using the past to manage for the future. Ecological Applications, 9(4):1189-1206.

Tausch, R.J., R.F. Miller, B.A. Roundy, and J.C. Chambers. Undated. Piñon and Juniper Field Guide: Asking the Right Questions to Select Appropriate Management Actions. U.S. Dept of Interior, Geologic Service Circular 1335. 108 pages.

25 Romme, William H., Craig D. Allen, John D. Bailey, William L. Baker, Brandon T. Bestelmeyer, Peter M. Brown, Karen S. Eisenhart, Lisa Floyd-Hanna, David W. Huffman, Brian F. Jacobs, Richard F. Miller, Esteban H. Muldavin, Thomas W. Swetnam, Robin J. Tausch, and Peter J. Weisberg. 2008. Historical and Modern Disturbance Regimes, Stand Structures, and Landscape Dynamics in Pinon-Juniper Vegetation of the Western U.S. Colorado State University, Fort Collins, CO. 37 pages.

7-d. ISSUE: The proposed Conservation Measures fail to address pinyon-juniper (woodland) encroachment into sagebrush / sage grouse habitat as an important issue needing specific recommendations for the Great Basin physiographic area which includes the CCDO.
Woodland encroachment is one of the most intractable problems facing sage grouse habitat management in the Great Basin. There is an extensive body of research and research publications concerning the history of woodlands in this physiographic area and the Colorado Plateau. Climate / carbon cycle changes, interruption of natural fire cycles, changes in class of grazing livestock and historic recovery of fuel wood areas have all contributed to an increase in the stocking rate and acreage dominated by woodlands. Water source and understory vegetation losses due to encroaching woodland areas have been researched and documented for many years. Woodland encroachment into sage grouse nesting / brooding (riparian area) habitat and connective habitat continues to make these areas less than ideal or unusable for sage grouse. Although CCDO has programs for woodland management, treatment is expensive and fraught with regulation on larger areas. Treatment of larger areas is usually the only way to create a significant benefit for a species like sage grouse. Whithout specific management objectives in sagebrush / woodland interface areas, crucial sage grouse habitat will be lost.

The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage--grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage--grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage-- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts.

Table C-5
Restoring Ecological Health

Plant life in the desert is very slow growing, and many species are very long-lived. Sagebrush stands can be a century old; likewise winterfat can live 130 years. Any habitat improvement - both long and short-term - should be undertaken whenever possible. If man-power is an issue, ask the communities for volunteers. There are untapped resources under the guise of volunteerism - in 4H, Scouting, retirees, conservationists - many of whom would relish the opportunity to restore plant communities on the ranges, perhaps especially in HMAs.

Vegetation - Sagebrush Steppe

Sagebrush manipulation/treatment is prohibited.

Selective hand--cutting of conifers only in areas where they are shown to conflict with sage-- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration).

The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock--
associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology.

Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage--grouse habitats of the ACEC.

The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage--grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage--grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage--grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts.

Vegetation - Weeds

Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long--term Viability for Sage--grouse and Other Sagebrush--dependent Species.

Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking.

These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations.

Table C-5
Restoring Ecological Health

These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.
Targeted active restoration actions that focus on removal of disturbances or developments promoting degradation such as sources for weed invasion and spread or that are promoting degradation of habitat components or diseases must beconsidered, as well. This is a very complex and important landscape that is under great threat from livestock degradation. See Mack and Thompson (1982), Fleischner et al. 1994, Ohmart 1996, Belsky et al. 1999, Knick et al. 2003, Dobkin and Sauder 2004, Connelly et al. 2004 Conservation Assessment for Greater Sage-grouse, Knick and Connelly 2009/2011 Studies in Avian Biology Chapters, USFWS Warranted But Precluded March 2010 finding for greater sagegrouse, recent BLM Instructions memos and sage-grouse habitat mapping, recent state sagegrouse plan and map iterations, and conservation planning documents. See also Interior Columbia Basin Ecosystem Sciences documents that highlight ecological concerns in the sagebrush and arid lands biomes. Example: Wisdom et al. (2002). See Great Basin and Nevada Rangeland Health Assessments conducted by BLM in mid-2000s, but that did not fully consider grazing's adverse impacts.
BLM must develop a set of site-specific required actions under alternatives that chart a rapid, decisive and clear path forward to ensure protection and restoration(where necessary) of critically important sagebrush, pinyon-juniper, salt desert shrub and other wild land habitats in a landscape undergoing significant invasive species expansion. The benefits of passive restoration (allowing ecosystem components to heal through removal of disturbance and degrading activities) must be fully considered.
BLM must also apply an upland trampling standard to limit disturbance to soils, microbiotic crusts, and native plants including seedlings. This must require that less than 5% of the area of a square meter monitored at representative typically grazed sites across the pasture is trampled. No areas of the allotment, including those receiving the most intensive use, should be allowed to receive greater than 10% of the surface area being trampled. Ranchers have horses and herders, and concentrations of livestock cannot be allowed. These disturbed sites create epicenters of disturbance where weed invasion, and then outward spread due to chronic livestock disturbance occurs.
Noxious Weeds, Invasive and Non-Native Species: Are current BLM programs and activities successful in controlling the spread of noxious and invasive weeds and other species? If not, the RMP should consider additional actions to address this critical problem.
1. Kill off foxtails, please. They are extremely damaging to dogs.
This project has numerous community partners actively involved already to assist BLM's efforts. It is recommended that BLM pursue a new approach with regard to stewardship and natural resource management in an effort to protect cultural resource, like the dry lake basin, and combat noxious and invasive weeds in our pristine public open spaces. Through active partnerships with groups like Washoe County and area non-profits including Keep Truckee Meadows Beautiful, Nevada Land Conservancy, Nevada Rock Art Foundation and others, we can work together to provide stewardship and active management of our cultural and natural resources

Table C-5
Restoring Ecological Health

BLM must also apply shrub protection standards, and require shrub structural integrity standards. No sagebrush plants or other shrubs anywhere in the pasture should receive more than 5% breakage or other impacts. All of these standards must be applied as triggers for immediate removal of livestock from the pasture. If the use level is reached, the livestock must be moved out. If any of these standards are exceeded in any year, livestock reductions in numbers will be put in place - with reductions of 25-50% for each violation along with more herding and other requirements. If ranchers are unable to meet these standards, they are unable to control their livestock, so the herd size is too large. If standards are exceeded in multiple years, livestock grazing must be ended in the pasture. Salt and especially supplement will not be used. Livestock trailing to salting/feeding sites - and the impacts of concentrated use at these sites - severely alters and reduces native vegetation. These disturbed sites provide centers for cheatgrass, medusahead, and other weeds to spread outward from.
Emergency Stabilization & Restoration: Non-native plants should rarely be used for rehabilitation, only temporarily in critical wildlife habitat areas or areas of excessive erosion potential until native plants can be established. Vegetative recovery objectives should be set for all rehabilitation projects, monitored for effectiveness, and closed to disturbances until recovery objectives are achieved.
Roundups Spread Weeds, Raise Fire Risk Weeds crowd out native forage and increase the risk of fires, especially during periods of drought. Fires, in turn, increase the infestation by weeds. It's a vicious cycle. Cheatgrass, especially, is a leading conservation challenge on public rangelands. CCDO is surely aware that motorized vehicles can be a source of new infestations. Studies have shown that vehicles -- such as the helicopters that chase the horses and burros and the trucks and trailers brought in to remove the animals via roads where weeds tend to be prevalent -- bring with them and spread exotic propagules. The rotor wash from the helicopters spreads the damage. In addition, hay that is trucked in to feed the animals post-roundup is also known to contain weed-seeds. Roundups are violent events that create "disturbances" as the mustangs are stampeded for miles. Disturbances lead to more distribution of propagules and damage to native forage and soil. BLM does not appear to have been practicing responsible management in this regard. The RMP Revision should stipulate only bait-and-water trapping whenever animals need to be removed. CCDO should end helicopter roundups.
Exotic Seeding Reclamation/Restoration Active restoration of crested wheatgrass seedings must be conducted through: >inter-seeding of sagebrush and forbs. >removal of CWG with techniques minimizing use of herbicides Active restoration of cheatgrass infestation areas without loss of shrubs cover to the maximum extent possible. In all cases of seeding - local native plant ecotype seeds and seedlings must be used. By far the cheapest and most cost-effective method to recover and restore plant communities is to remove livestock grazing and trampling disturbance from those communities that have not yet undergone significant weed invasion. These communities will be buffered to help limit weed infestations. This will also maximize site resiliency if fires occur, and understories will be in better condition andmore readily able to heal. It is unrealistic to think that BLM can prevent wild land fires, and methods often proposed by the agency have significant adverse impacts -ranging from planting aggressive weedy species to promoting more cheatgrass through removal of shrubs which results in a hotter, drier, morefire and cheatgrass-prone site with a longer fire season.

Table C-5
Restoring Ecological Health

RECREATION / OHV (Hunting, Fishing, Hiking, Biking etc) 6. ISSUE: OHV track / trail mileage has increased exponentially, creating a web of trails, tracks and roads There has been an exponential increase in miles of OHV tracks / trails. In the lower west Pine Nut range, OHV tracks can be found on and in nearly every ridge and drainage, and on many hills. Many hills have parallel OHV trails on them, located just a few yards apart. The Sunrise Pass road now has a deep OHV trail paralleling it that didn't exist just a couple of years ago. Each OHV rider wants to ride in virgin country, blazing their own trail. The definition of "access" for many OHV users means cutting a new trail every time they're out. Every spring site in the Pine Nuts has at least an OHV trail to it which allows disturbance for deer fawn rearing and sage grouse brooding. Trails fragment many types of wildlife habitat which affects species diversity and help spread noxious weeds. Trails allow soil erosion to occur which eventually turn the trails into deep cuts that are impassible -creating a reason to make new OHV trails. During a recent attempt at an inventory of tracks / trails / roads in one area of the CCDO, the increase was so rapid, the inventory couldn't keep pace. It's nearly impossible to write effective regulations limiting OHV use to existing trails because new ones are created every day and are "existing" by nightfall. The problem has become especially bad since the USFS in California and part of Nevada closed its road system to OHV use except where posted open. The CCDO with specific areas like the Pine Nut Range is receiving unprecedented use from riders blocked from USFS lands
Stocking must be properly applied so that these standards can be attained during every grazing disturbance episode. This all provides for protection of microbiotic crusts, a frontline defense against cheatgrass and other invasive species.
6. Noxious Weeds: In some areas, whitetop has overgrown much of the existing plants. Where is the BLM when needed? In the State of Oregon, it has overwhelmed some counties.
The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock-- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage--grouse habitats of the ACEC.
Wetland and Riparian Vegetation
The Nevada WAP serves as a comprehensive, landscape level plan, identifying the species of greatest conservation need and the key habitats on which they depend, with the intent to prevent wildlife species from becoming threatened or endangered. The WAP contains a conservation strategy to provide guidance to successfully conserve Nevada's key habitats and priority species. This conservation strategy has been appropriately manage spring and riparian resources as these areas are especially important to wildlife.

Table C-5
Restoring Ecological Health

Areas back from the green line must be measured and monitored and these standards applied in these areas, too. Mesic and meadow areas that are not right by the water's edge are much less likely to regrow - yet are critical for protecting and conserving vital watershed values, and protecting riparian/meadow areas linked to aquatic habitat health. They are essential to provide sage-grouse brood rearing and recovery of habitat components for species. Agencies have long biased monitoring of impacts by measuring only the thin greenline right by the water's edge, thus examining species likely to regrow following heavy grazing rather than the vegetation in the adjacent riparian/meadow area which provides suitable conditions for the forbs required by sage-grouse broods. See for example, Ohmart (1996), Belsky et al. (1998).
Fisheries Management NDOW requests that the RMP allow for the introduction, reintroduction, augmentation, stocking or transplant of native and nonnative fish species. Additionally we request that other fisheries management activities such as stream and fish surveys (e.g. electro shocking,fish counter installation, etc.), rotenone and other registered piscicide treatments, etc. be allowed in the RMP. Rotenone and other registered piscicide treatments may be necessary to prepare waters for reestablishment of indigenous fish species, to protect or recover federally listed threatened or endangered species, to enhance sport fisheries, to remove undesirable non-native species or to correct undesirable conditions resulting from human-caused influence.
7- h. ISSUE: The class of cattle permitted in sage grouse habitat has not been discussed in the Conservation Measures and needs to be addressed in the RMP. The class of cow that grazes may be important to sage grouse habitat. Rangeland managers and livestock producers know that cow / calf pairs use a grazing allotment differently than steers, particularly yearlings. Cows tend to remain in gentler topography and nearer water which in Nevada means areas with riparian areas. Stockmen tend to not push pairs into rougher country. Use levels on riparian areas and bottom lands are met quickly - often well ahead of the AMP's "off" date. When this occurs, pairs often remain in the pasture or allotment for a variety of reasons; utilization levels are exceeded, riparian / range conditions change or deteriorate. Conversely, steers will travel farther within an allotment to seek forage and can be pushed into rougher country. Yearling animals exhibit a natural curiosity that helps disperse these animals better and they can be pushed further into rougher country.
Riparian and Wetland Areas: Any BLM management which results in Proper Functioning Condition of these critical areas should be continued.
1) Aspen/cottonwood Management should be a priority for this office. Inventory existing aspen/cottonwood stands on BLM managed lands and set up a program to protect the stands being impacted by grazing. All stands should be protected within six years and a inspection/mantainance program set up on an annual basis to maintain exclosures.
2) The same type of program should also be set up for Springs and other sensitive riparian areas. Many springs/riparian areas are being hammered by horses and livestock in the CCDO jurisdiction. A program should have been set up and fully implemented years ago for this.
BLM must also apply criteria that determine if damaged areas -such as springs, seeps, intermittent drainages, damaged headcuttingstreams, sagebrush uplands highly vulnerable to cheatgrass spread and other areas can withstand any continued grazing disturbance. Mitigation by avoidance must be conducted - and it must involve pulling livestock use back to existing pastures, not carving the landscape up into even more pastures.
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Table C-5
Restoring Ecological Health

These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified.

The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts

The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.

1) Aspen/cottonwood Management should be a priority for this office. Inventory existing aspen/cottonwood stands on BLM managed lands and set up a program to protect the stands being impacted by grazing. All stands should be protected within six years and a inspection/mantainance program set up on an annual basis to maintain exclosures.

ISSUE 2: AIR AND ATMOSPHERIC VALUES

Table C-6
Air and Atmospheric Values

Air Quality
3. Comment on Issue 2 as identified on the issues webpage; "Air and Atmospheric Values Our concern here is similar to comment 1 in this section and in Section C. The term "air and atmospheric values" is not sufficiently defined in the BLM's materials available to the public. Air quality and specific mandates regarding planning and management are already incorporated in planning guidance, making this "issue" redundant. Because "air and atmospheric values" is not sufficiently defined in BLM's materials, incorporating this issue as a Significant Planning Issue will require the CCDO provide for additional opportunity for public input in order to comply with mandates requiring meaningful public input when formulating land use plans.

ISSUE 3: WATER RESOURCES

Table C-7
Water Resources

Active restoration: Where possible without further damage to springs/water sources, remove water line piping and maximize surface water at spring/stream sources supporting diverse riparian and meadow vegetation, i.e. try to bring the spring system back to as natural a state as possible by reducing water removal form the spring site/source. Promote natural healing of headcuts to the maximum extent possible by limiting disturbance throughout the watershed. Do not merely dump rocks and boulders into headcut – as this often destroys the potential for anything resembling natural recovery of meadow systems, and often leaves dying riparian areas permanently cut off from former riparian/mesic zones. At times, a combination of methods may need to be used but simply plugging headcuts without providing for the ability of natural riparian/meadow recovery to some degree is not acceptable. At times, some structures or armoring may be used, but cannot be divorced from integrated watershed recovery.
· Hydrologic Disruption and Contamination (Fleischner, 1994) (Belsky, Matzke, Uselman, 1999) (Wuerthner, Matteson, 2002)
Here are my responses to your some of your comment solicitations: -I do not believe that the HMA boundaries should be adjusted at this point in time. Resources should be conserved because of the current economic crisis. None of Nevada's valuable resources should be spent making unnecessary changes but rather every effort should be made to reduce costs. -If necessary, wild horse experts such as Laura Leigh should be consulted to determine habitat and population suitability and viability. -Methods other than gathers that could be considered include bait trapping and contraceptive darting. -Urban-interface issues could also be addressed though bait trapping and fencing. -There is plenty of land for the horses. -Herds should have 10-14 members with 1 male per herd. -Habitat improvement includes removal of hazards prior to roundup. -Harvest rain to conserve water and supplement the natural occurring source that are depleted by the drought. This will benefit all species.
NEPA PROCESS 9. ISSUE: Private and foreign contract military personnel operate without NEPA or permitting. I recently had a conversation with a packer who rented mules to a military entity for specialized troop training (mules are used in Afghanistan). The animals were being used in the south central portion of the CCDO. That area has already seen desert bighorn guzzlers used as ambush blinds in "military" games. Public users have been stopped by "military" personnel on public lands roads. Private, for-hire contract military personnel use CCDO to train private troops / security personnel. Private contract military personnel have been in CCDO to discuss use of public lands, but their activities were never analyzed, no stipulations / mitigation given and no permit for use issued. The use of wildlife guzzlers is one example of potential impacts. Sportsmen's groups, the state and the BLM have spent thousands of dollars on bighorn guzzlers in order to try to maintain this native species. If bighorn are disallowed the ability to drink or are conditioned to avoid guzzlers or even shot at, an American resource is being damaged. If a mule pack train travels through a bighorn lambing ground or sage grouse lek, these activities could be impacted. The extent of this issue is unknown because the activity hasn't been analyzed. In New Mexico, the USFS has put Air Force PJ training under a special use permit that has worked for all concerned. If they can do it, certainly CCDO can do it for private military people who are simply public land users.

Table C-7
Water Resources

8.) When to develop water for horses and burros. Any new water development for horses/burros should be done for the purpose of improving/changing/ rotating the distribution of animals, or for the protection of the water source. Nevada BLM needs to continue to work with the Nevada State Water Engineer to get approval for water rights for wild horses and burros.

If there are exiting water sources in the HMA and horses/burros have impacted these sources, then the BLM should design and install spring exclosures and water developments that can withstand horse/burro use. If there is exiting water sources with water rights, and horses/burros are using these sources, or have impacted them, then the BLM should work with holder of the water right and the State of Nevada to help develop and protect these water sources. If water is limited in the HMA, but there is opportunity to use it to trap horses, then the CCDO should work with water right holders to develop/improve water sources and include temporary or permanent fencing at the sources for future water trapping. If no water is available in the HMA, then AML should be set to 0.

7. Identification of Public Lands for Disposal

The BLM must evaluate the sustainable capacity of the resources to support the expanded growth of these areas to be disposed. Of primary concern is the level of sustainability with regards to water needs. Growing scientific evidence is making it clear that the level of groundwater needs for continued growth.

Any areas identified for disposal must be encumbered with the assurance that comprehensive NEPA will conducted prior to any conveyance of the land.

Another concern related to renewable energy development, particularly solar and geothermal is the water needs for the development and operation of the site. Cooling for concentrated solar facilities, cleaning of photovoltaic mirrors, and water to support geothermal wells can consume thousands of acre feet every year. Being the driest state in the country, Nevada does not have an abundance of water for such uses. Lacking surface water resources, most of the water needed to support renewable energy projects is demanded from groundwater well. Many basins in Nevada are already over appropriated and pumping from them is already threatening seeps and springs and the species that depend upon them, such as rare desert fish and springsnails.

The law clearly states that wild horses and burros should be protected as viable herds. To that end, and to help herds in the remaining HMA's, it is appropriate to develop water sources as needed to keep the herds at AML.

Table C-7
Water Resources

Second Water Option → Less Time in Streams; plus, Counter-Intuitive Findings on Grazing Research shows that providing a second, non-stream source of water significantly decreases the time cattle spend in natural streams. Cattle stayed an average of only 1.6 minutes with a second source, but lingered 25.6 minutes without one. A second water source also enables the same range to accommodate 85 to 150 additional AUMs. These findings would appear to support guzzler installation throughout the CCDO's jurisdiction.. Additional studies have found that pasture size and distance to water have a greater effect on cattle foraging activity than does the grazing system (continuous vs. rotational). These findings suggest that rotational grazing systems are unlikely to improve animal performance over continuous grazing unless pasture size and distance to water are reduced below previous levels. Other studies have found that, ironically, cattle spend more time in areas where the forage has been intensively grazed the previous year than in areas that have been rested -- not grazed -- during the preceding year. Forage in areas that had been grazed during the previous year had higher crude protein concentrations than in areas that had been rested. Further, the research shows that forage quality and quantity can be improved by burning and fertilization. Http://jas.fass.org/content/82/13_suppl/E147.full
When is it appropriate to develop or augment water for horses and burros? Water development is appropriate when it is used to direct the location of the herds, to move them around an HMA, or away from a populated area, etc. Obviously, care should be taken not to add large numbers of water sources that would encourage population spikes. Water is a legitimate limiting factor in the desert, but should not be allocated based on politics, etc. No animals respect arbitrary human lines and rules - water should be available where it is " or in reasonable proximity" for all animals to utilize.
When is it appropriate to develop or augment water for horses and burros? It is appropriate to augment water for wild equines when the lack of access relates to sources of water are cut off from them, via ranchers' fencing, mining expansion or a highway project - etc. Some emergency water in extreme drought. Know that wild horses may lose weight for various reasons, a temporary shortage of food is not a reason to remove them. If there is a conflict of water resources, drill a well.
It is important that burros and mustangs have adequate access to areas with water.
Areas back from the green line must be measured and monitored and these standards applied in these areas, too. Mesic and meadow areas that are not right by the water's edge are much less likely to regrow - yet are critical for protecting and conserving vital watershed values, and protecting riparian/meadow areas linked to aquatic habitat health. They are essential to provide sage-grouse brood rearing and recovery of habitat components for species. Agencies have long biased monitoring of impacts by measuring only the thin greenline right by the water's edge, thus examining species likely to regrow following heavy grazing rather than the vegetation in the adjacent riparian/meadow area which provides suitable conditions for the forbs required by sage-grouse broods. See for example, Ohmart (1996), Belsky et al. (1998).
We pay millions of taxpayer dollars to round-up and pen wild horses in places far away from their stomping grounds. That money should instead be spent by the BLM to restore and improve land and water resources of the public lands.

Table C-7
Water Resources

Water Resources: In the absence of state water quality (WQ) standards for seeps and springs on public lands, the BLM should set and enforce WQ standards for these key resources. All watersheds which provide municipal water supplies and are necessary habitat for TES species should be protected and managed to the highest standards of ecological health. Actions to achieve these objectives should be evaluated in the RMP, including controlling roads, vehicular use, recreational and grazing uses, etc. Water rights, either federal reserved or state granted, should be acquired for water-dependent public lands and resources. The RMP should propose additional actions to protect and conserve Walker Lake.

Following are specific answers to questions listed in the RMP 10.2 Geothermal Resources Fact Sheet:
How can the BLM improve the management of geothermal resources?
The RMP must include a detailed analysis of water usage for geothermal developments. This must include site specific information regarding each water source, aquifer and the water sources the development will directly or indirectly impact over the short- and long-term.

Following are specific answers to questions listed in the RMP 10.1 Minerals Fact Sheet:
How should mineral development be managed to minimize resource conflicts?

The RMP must mandate the full disclosure of water usage and how that water usage impacts springs and other water sources in and around the area. Mineral development must be managed with an understanding of the implications that the development has on water aquifers and the impact that reduction of water has on the greater habitat.

We urge the Carson City District for cease the issuance of permits and leases for mineral extraction in and around HAs and HMAs due to the significant environmental degradation and tremendous water usage involved in such operations. It is ironic that the BLM blames wild horses and burros for the usage of water while the agency permits minimal leases to utilize quantities many times over what any wild horses and burros could possible use.

The RMP must mandate the full disclosure of all water usage for any mineral development - including but not limited to specific aquifer information, identification of springs and water sources impacted by the aquifers, all short- and long-term impact the use of water may have from any given area, etc.

Water usage should be clearly defined and allocated- and fair distribution of this valuable resource must be a cornerstone of the RMP- commercial usage of public lands should not receive the lion's share of the water resources. Wildlife, including wild horses and burros, should receive adequate allocations.

Likewise, water guzzling energy projects should not be allowed on HMAs or HAs. In this day and age, it is simply out of the question to allow projects that are water intensive to proceed on water-challenged public lands.

We recommend that if geothermal projects are allowed, it should only be with a legal assurance from the developer that there will be adequate water for all wildlife, including wild horses and burros and that the land will eventually be restored to its pre-development state or in a better state than when development began.

Livestock should be removed immediately if a permittee repeatedly ignores the rules of the permit as has apparently been the case in western Nevada. Bullying the BLM should not be permitted. It goes without saying that a permittee who defies the Agency and knowingly continues to break the terms of his agreement should have his livestock confiscated.

Table C-7
Water Resources

Livestock Reduction/Energy Development

Competition for water between wild horses and livestock on public lands in the Carson City District is a real and escalating problem. On legally designated wild horse ranges, which constitute such a small percentage of all public lands and a small percentage of public lands in comparison with privately owned cattle, the wild horse and burro should receive its fair share of not only forage, but water. As the principle user on these relatively few areas, the Act mandates fairness. We recommend that any reductions in use should occur among the ranks of the private livestock on public lands not wild horses.

In years like this one, when Carson District public lands have received less than normal moisture, cattle and sheep should be removed, so that the legally designated, principle grazers remain-namely wild horses and burros. The kneejerk reaction made to remove wild horses in northern Nevada without considering other alternatives is shortsighted and unnecessary. The majority of these animals will be warehoused. Now more than ever, this should be a last resort option, not the unsustainable first choice.

Scoping Handout - 8.3 Riparian

As stated in this legal document (link below) prepared by BLM, it is livestock and not wild horses that cause extensive riparian damage. Wetlands and Riparian Zones Ranchers and BLM wild horse and burro (WH&B) staffers commonly believe that horses spend less time in wetlands and riparian zones than do cattle. Under this premise the grazing of wild horses the likelihood of stream bank degradation is assumed to be less than with cattle grazing. ftp://ftp.blm.gov/pub/whb/WHB%20EAs/EA%20NM-040-2009-082%20JANUARY%202010.pdf Thus the majority of riparian damage in the CC RMP district can be eliminated by the removal of livestock and the elimination and/or close monitoring of any and all other commercial interests being permitted to operate on public land. This monitoring and these decisions must be honestly and scientifically valid and not politically driven, as we have seen done over and over in the past.

Table C-7
Water Resources

Water Sources -- Protect Them, Add Guzzlers, Forget Pipelines CCDO needs to establish alternative water sources for the current principal consumers -- ivestock -- as well as for the wild horses, burros, and other wildlife. As landlord of the multiple-use range, BLM is responsible and accountable for providing water sources and maintaining them. However, installing miles of pipelines to bring water to the livestock constitutes inappropriate subsidization of the beef sector. Instead, rain and snow catchment devices, commonly referred to as "guzzlers," should be strategically installed throughout the planning area, especially in the HMAs. Guzzlers capture, conserve, and release water, much like cisterns. Such systems are long-lived and require little maintenance, especially if constructed of cement. Their covers reduce evaporation -- a beneficial feature that provides an advantage over open reservoirs. Guzzlers also reduce the need to haul water into wilderness areas, should there be a\ severe drought. Guzzlers come in all sizes and configurations. Those with a 10,000-gallon storage tank can support herds of big game animals -- and mustangs. Such large guzzlers can be buried underground, thus preserving wilderness vistas. Construction materials can be hauled into remote areas by helicopter, which will be a "constructive" use of the aircraft services contract. Below are the links to Web sites for more information on guzzler use by all sizes of animals. Guzzlers can even be used by humans. These Web sites also address guzzler design and construction, including a materials list and schematics. Http://www.tpwd.state.tx.us/publications/pwdpubs/media/pwd_bk_w7000_0032.pdf http://www.tpwmagazine.com/archive/2003/dec/legend/ http://wildlife.utah.gov/wr/0706guzzler/0706guzzler.pdf http://muledeercountry.com/2009/09/mdf-water-guzzler/
The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage--grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage--grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage-- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts.
NDOW request that the RMP allow for the introduction, reintroduction, augmentation, exportation, pioneering, or transplant of endemic native and non-native wildlife. Specifically, we request that mountain quail, ruffed, and blue grouse be allowed on the CCD within areas of potential habitat. Additionally we request that elk pioneering be allowed. Furthermore, we request other game management activities such as surveys (e.g. aerial and terrestrial), water development, etc. be allowed in the RMP.
We recommend water continue to flow to livestock water developments through the hot summer months even when livestock use of the water development isn't occurring. Wildlife becomes habituated and reliant upon water at development sites while being utilized in conjunction with livestock operations. These development sites can act as wildlife traps if water is discontinued when livestock use is no longer occurring. If water is discontinued during the hot summer months then wildlife dehydration is likely to occur that may result in wildlife mortalities.

Table C-7
Water Resources

Good range management should include: RANGE MANAGEMENT/ DATA All forage allocations (AUMs) within the Herd Management Area should be included in the range-management data. Monitoring which distinguishes between Wild Horse impacts as compared to grazing livestock and other wildlife impacts on range resources. Water usage should be clearly defined and FAIRLY allocated Maps and analyses which clearly show impacts on Wild Horses and/or Wild Burros caused by any and all commercial usage of public lands within the HMAs. Full disclosure of all cattle guards in the Herd Management area. Any and all cattle guards should be either removed or fitted with Wild Horse Annie cattle guards which are specifically designed so as to be safe for Horses and Burros to cross. Commercial usage of public lands should not receive the lions share of water resources. Wildlife, including wild horses and burros, should receive adequate allocations.
In addition, the Environmental Analysis for the RMP should include hard data on range conditions, impacts of livestock grazing on the range and a clear delineation on maps and in the analysis of the impacts on wild horses and/or burros caused by all commercial uses allowed within the HMAs. Water usage should be clearly defined and allocated -- and fair distribution of this valuable resource must be a cornerstone of the RMP -- commercial usage of public lands should not receive the lion's share of the water resources. Wildlife, including wild horses and burros, should receive adequate allocations.
In addition, the Environmental Analysis for the RMP should include hard data on range conditions, impacts of livestock grazing on the range and a clear delineation on maps and in the analysis of the impacts on wild horses and/or burros caused by all commercial uses allowed within the HMAs. Water usage should be clearly defined and allocated -- and fair distribution of this valuable resource must be a cornerstone of the RMP -- commercial usage of public lands should not receive the lion's share of the water resources. Wildlife, including wild horses and burros, should receive adequate allocations. Stop catering to your corporate paymasters, the cattle ranchers....especially at the expense and suffering of the horses. The corruption and influence peddling is obvious to everyone. Be ashamed.
The above makes me proud to read the above, for it is detailed, comprehensive, and while it will take hard work, it is the work that must and should be done to stop preference to cattle grazing and water use, and set mandated limits to cattle, and ensure that we preserve, honor, our horses and burros. Please do implement the above.
There is plenty of land to accommodate these herds in a humane and equitable manner. We must stop, once and for all, the distribution of lands based solely on profits. The ecosystem needs these herds. America deserves these herds. They are a part of who we are. You must also make certain that these herds have adequate water supplies. Please remember, we are a PART OF, not THE, environment. We need to share, not devour the land. Thank you for your consideration.

Table C-7
Water Resources

Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration.
Water source development or augmentation should take place wherever wild horses and other wildlife occur; all will benefit from these improvements. Many EAs have anecdotal information outlining wild horses chasing other wildlife from a pond or stream, but these stories fail to indicate the deer that chase off the pronghorn, or the pronghorn that chase off the jackrabbit. Nearly every living thing in the desert will dominate a smaller entity - the horse being larger than the deer, the deer being larger than the pronghorn. It's a natural occurrence. If a spring or trough is developed, all will benefit. If water sources become scarce or unavailable, perhaps some thought should be given to supplemental watering. None of the animals on the range should be made to suffer for the conditions of the ranges they have chosen - or were forced - to live on.
These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.
Fisheries Management NDOW requests that the RMP allow for the introduction, reintroduction, augmentation, stocking or transplant of native and nonnative fish species. Additionally we request that other fisheries management activities such as stream and fish surveys (e.g. electro shocking,fish counter installation, etc.), rotenone and other registered piscicide treatments, etc. be allowed in the RMP. Rotenone and other registered piscicide treatments may be necessary to prepare waters for reestablishment of indigenous fish species, to protect or recover federally listed threatened or endangered species, to enhance sport fisheries, to remove undesirable non-native species or to correct undesirable conditions resulting from human-caused influence.
The RMP should also address acquisition, preservation and restoration of property along the Truckee River and its tributaries as a priority to preserve this important natural resource.
4. Comment on Issue 3 as identified on the issues webpage; "Water" We're tempted to simply say "ditto." Planning guidance for protecting water rights and water quality are extensive and qualify as a mandate already placed on the agency. We could be wrong, but it doesn't seem logical that these mandates allow the agency to develop a "range" in the Alternatives. Therefore, introducing "water" as a Significant Planning Issue is redundant and may unlawfully narrow the range of Alternatives and Decision.
When is it appropriate to develop or augment water for horses and burros? Always. It's a lot cheaper that roundups. If BLM were not allowing projects that were sucking up so much water out of the aquifer for a lot of other uses, there would be enough water for the horses. BLM gives all sorts of perks to other uses (like those FONSIs for uses that really DO have a lot of significant impact.)
Where are habitat improvement projects appropriate? What kinds of improvement projects are feasible? Drill some wells or pipe in some water for sources of water for the wild horses. The logistics are easier than planning a roundup, and it would be cheaper than roundups.

Table C-7
Water Resources

How should BLM address wild horse and burro urban-interface issues?

How about considering CUMULATIVE use in the area when using 2,4-D? Consider this:

The EPA says that 2,4-D is seventh largest source of dioxin in the U.S.

Dioxin DCDD that contaminates 2,4-D herbicide is not tested, measured or monitored by the EPA, or even regulated. A Canadian research paper states that dioxin DCDD may have large public health implications due to its prevalence in our food and environment.

DCDD is one of the hundreds of kinds of dioxin - (TCDD is the worst, but DCDD may be equi-potent):

http://group.bmj.com/docs/pdf/8_3_s10.pdf
"2,4-D is contaminated with an unmonitored form of dioxin, 2,7-dichlorodibenzo-p-dioxin (2,7- DCDD)...There is very little research on this form of dioxin, but in 1986 2,7-DCDD was found to be "equipotent" to the very toxic 2,3,7,8-TCDD in a test of immunosuppression. Given the wide use of herbicides that are contaminated with 2,7-DCDD there may be large public health implications of this contamination of our food and environment."
The BLM needs to do an aggregate risk assessment considering exposures to humans, animals, water, drinking water, plants from COMBINED SOURCES in the area. BLM should do Drinking Water Level of Concern (DWLOC) testing and use the Forward Calculation Approach to include in an EIS when planning to use 2,4-D.

According to the Environmental Protection Agency (EPA) 2,4D:

Exposure to 2,4-D has been reported to result in blood, liver, and kidney toxicity (1, 2, 4). Chronic oral exposure in experimental animals have resulted in adverse effects on the eye, thyroid, kidney, adrenals, and ovaries/testes (1). Experimental animal studies have demonstrated delayed neurobehavioral development and changes in neurotransmitter concentrations in offspring exposed during pregnancy or lactation (5-9).

Low concentrations of 2,4-D have been found in groundwater in some states. Agricultural run-off containing 2,4-D may contaminate groundwater in some areas.

Experimental animal studies of chronic oral exposure have reported adverse effects on the eye, thyroid, kidney, adrenals, adrenals, and ovaries/testes (1). In addition, some experimental animal studies have reported teratogenic effects (birth defects) at high doses, including increased fetal death, urinary tract malformation, and extra ribs (15, 16). When adult female experimental animals were exposed to 2,4-D during their pregnancy and lactation periods, their exposed offspring exhibited neurological effects, including delayed neurobehavioral development (5) and changes in several neurotransmitter levels or binding activities (6-9, 17) and ganglioside levels (18, 19) in the brain. Delayed neurobehavioral development was manifested as delays in acquisition of certain motor skills such as the righting reflex (5).

Table C-7
Water Resources

What criteria should be used to make habitat and populaon suitability and viability determinaons? If you have some horses that drink about 15 gallons of water a day, and you have solar projects that can use billions of gallons of water from an aquifer for just one project, or new mines and mining expansions that use a lot of water and you instruct mining companies to only do 10' and 20' water drawdown maps (instead of 1' and 5' water drawdown maps),and dig up tons of earth, or you're selling many acres of public lands for oil and gas leases, don't remove wild horses because of "degradation to the environment" or to keep a "thriving ecological balance." You will be perpetrating fraud against the American public by making this statement. You share an aquifer that doesn't stop at your BLM district office boundaries. If there isn't enough water or forage (because there isn't enough water) it is because the BLM is mismanaging land uses. For example, if you are worried about the drought, instead of fast-tracking solar projects, you should curtail them.
2) The same type of program should also be set up for Springs and other sensitive riparian areas. Many springs/riparian areas are being hammered by horses and livestock in the CCDO jurisdiction. A program should have been set up and fully implemented years ago for this.
Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area.

ISSUE 4: CULTURAL RESOURCES, NATIVE AMERICAN CONCERNS AND PALEONTOLOGY RESOURCES

Table C-8
Cultural Resources, Native American Concerns and Paleontology Resources

Cultural and Heritage Resources
4. Comments regarding "Native American religious and traditional values" BRC's members have concerns about adopting provisions that are intended to provide exclusive access, eliminate motorized transportation uses and/or give special favor for select religious or religious/cultural beliefs. Many BRC members believe strongly that these provisions would in some way violate the Free Exercise Clause, the Establishment Clause, the Equal Protection Clause and the Due Process Clause of the United States Constitution. Many believe special provisions and exclusive access provided by the agency essentially establishes a tribe's religion within and over the Planning Area, with such religious beliefs to override and exclude other lawful interests.
I am also concerned about the protection of the archeological values in the district since there seem to be some outlaws who deface petroglyphs and dig out artifacts. There should be close cooperation between the BLM and the Washoe Co. Sheriff's office on these crimes.
n particular, future plans for the Sun Valley Rim Trail and Canoe Hill Trail System, which are greatly desired by the public, are very dependent on cooperative participation by BLM and should be included in the RMP. If these trail corridors could be addressed with the Environmental Assessment associated with the RMP, it would greatly assist Washoe County and our community partners on these projects. At minimum, if these important trail systems were included in the RMP for future accommodation, it would be greatly appreciated by our agency, our partners, and for future generations. We recommend that T20 R21 S19, 30, 31; T19 R21 S5, 6, 7, 8 be retained to accommodate the Canoe Hill Trail System or possible considered for R&PP designations. This is near a sensitive cultural area, but is in great need for managed recreation to reduce current user conflicts and on-going safety issues with congested area shooting and recreation participants.
This project has numerous community partners actively involved already to assist BLM's efforts. It is recommended that BLM pursue a new approach with regard to stewardship and natural resource management in an effort to protect cultural resource, like the dry lake basin, and combat noxious and invasive weeds in our pristine public open spaces. Through active partnerships with groups like Washoe County and area non-profits including Keep Truckee Meadows Beautiful, Nevada Land Conservancy, Nevada Rock Art Foundation and others, we can work together to provide stewardship and active management of our cultural and natural resources
Mineral Resources: Core priority habitats for Greater Sage Grouse and other TES species should be withdrawn from mineral entry. Seasonal and other restrictions should be required as conditions of permit approval to protect other wildlife habitat and cultural resources.
It's not that we look down on the services of mining industry or miners, it is just not appropriate in a Superfund site where airborne mercury could be carried on the wind, caused by the ever-present dust of mining and mining exploration. And it's not appropriate in one of America's largest historic districts, and certainly not in a historic town with National Landmark status. The Comstock and surrounding BLM lands should be off limits to any disturbance that is damaging to our national reputation, that does not fit with our historic character and mission, and that poses serious risks to our health.
3) Respect the wishes of the Indian Tribe's gated fenced property on Stockyard Road and do not trespass. An Indian named Leroy lives there and respects the people that use the lands outside of his fence. There are roads around his property to enjoy the mountain. Staying off his tribal property keeps everyone happy. Signs would help to eliminate confrontations.

Table C-8
Cultural Resources, Native American Concerns and Paleontology Resources

We would like to comment on the RMP and EIS that was published in the Federal Register on 2/24/2012. We live, work, own property and have businesses in the Virginia City Historic Landmark. This Landmark designation was originally intended to protect our historic district from surface mining. It, unfortunately, has little regulatory authority, although, it is administered by the US Park Service. This area roughly coincides with the Carson River Mercury Superfund Site (CRMS); know to contain 15 million pounds of missing mercury as well as unquantified amounts of lead and arsenic, used in historic milling processes. We strongly urge that any public lands in the CRMS and the Virginia City Historic Landmark be kept under BLM management. Neither the State of Nevada or Storey County have shown an ability to be stewards of this historic and environmentally contaminated area.

5. Comments regarding Issue 4 as identified on the issues webpage; "Cultural Resources, Native American Concerns and Paleontology Resources"
Clearly, the issue of "cultural clearance" of designated roads and trails (both motorized and nonmotorized trails) will have to be addressed in the RMP and the TMP.

It seems unreasonable to require that every linear mile be "cleared" before the TMP is finalized. It seems logical therefore to develop process for complying with the cultural clearances on recreational travel routes. Naturally, BLM must coordinate with the State Historic Preservation Officer regarding what will be necessary to be in compliance with law and regulations.

The BLM should utilize any cultural resource inventories conducted pursuant to livestock grazing allotment analysis and Special Recreation Event permits.

Finally, with tongue only halfway planted in our cheek, we'll add "ditto." (Please see our concerns above and in Section C) as well as add that if "Native American Concerns" rates as a "Significant Planning Issue" then "State and Local Government Concerns" certainly should as well.

Table C-8
Cultural Resources, Native American Concerns and Paleontology Resources

In Lyng v. Northwest Indian Cemetery Protective Association, 485 U.S. 439, 452-53 (1988), the Supreme Court warned against imposing "religious servitudes" over public lands, stating, "No disrespect for these practices is implied when one notes that such beliefs could easily require de facto beneficial ownership of some rather spacious tracts of public property. Even without anticipating future cases, the diminuation of the Government's property rights, and the concomitant subsidy of the Indian religion, would in this case be far from trivial: the District Court's order permanently forbade commercial timber harvesting, or the construction of a two-lane road, anywhere in the area covering a full 27 sections (i.e. more than 17,000 acres) of public land." Some citizens hold religious beliefs that man is God's highest creation; that man is steward of nature; that man is to improve nature and make it fruitful for the benefit of man; and that it is idolatry to worship creation. Should we then give these citizens exclusive access? Even the dissent in Lyng recognized that asking the government to restrict private parties' access to public lands for religious reasons is patently unlawful. Justice Brennan wrote, "Should respondents or any other group seek to force the Government to protect their religious practices from interference of private parties, such a demand would implicate not only the concerns of the Free Exercise Clause, but those of the Establishment Clause as well." In a Draft RMP released for public review recently in Idaho, several recreation management "standards" and "objectives" seem to represent a wholly one-sided paradigm, providing exclusive access and special favor for a certain religion, and excluding opposing religious and non-religious considerations. The tribal religion-based restrictions in the Draft were presumed good. Other uses based on other beliefs/non-beliefs and philosophies were presumed bad. Please do not misunderstand our comment here. Our members do not wish to hinder activities that are important to members of tribes. Our members believe management via the multiple use/sustained yield paradigm need not conflict with the tribal uses and values.
Personal feelings aside I urge you to take the Storey County BLM lands off the list of disposable properties. Our valuable Historic Landmark and the state Historic District need all the federal oversight and protection they can get, and so do those of us who live here.
4. The SHPO notes that some culturally-significant resources, such as Mount Grant, are also located in important habitat for the bistate Sage Grouse. The SHPO recommends that efforts to conserve this important habitat could also contribute to the preservation of this culturally important location.
This is a response to your memoranda of April 18, 2012, and public comments due to BLM, April 201 2, in regard to the RMP. The mountain ranges of concern are the Stillwater Mtns., Sand Mountain areas, Clan Alpine Mtns., Desatoya Mtns., etc. in Central Nevada.
Paleontological Resources
Fossils a fragile non-renewable resource deserving responsible conservation The timestamps left by the paleontological resources in the management area, whether they be impressions of Jurassic ammonoidea, permineralized wood or bones from Pliocene fauna, have proven to be vital as biostratigraphic markers in unravelling the lithographic puzzle of the Basin and Range to Sierra Nevada transition zone. These resources are fragile and deserve conservation efforts, including the courage to relocate the Pinenut Common Use Area gravel pit and subject ongoing mineral resource extractions to the requirements of the National Environmental Policy Act. Circumventing good decision-making procedures by relying on decisions made in ignorance prior to the legislative demands is not responsible conservation.
Trails in the Ruhenstroth area were closed to protect paleontological resources

Table C-8
Cultural Resources, Native American Concerns and Paleontology Resources

Tribal Interests and Native American Religious Concerns
The American Indian Religious Freedom Act, P.L. 95-341, 92 Stat.469 (Aug. 11, 1978) (AIRFA), codified at 42 U.S.C.§ 1 996, is a United States federal law and a joint resolution of Congress that was passed in 1978. It was enacted to protect and preserve the traditional religious rights and cultural practices of American Indians, Eskimos, Aleuts, and Native Hawaiians. There rights include, but are not limited to, access of sacred sites, freedom to worship through ceremonial and traditional rights and use and possession of objects considered sacred. The Act required policies of all government agencies to eliminate interference with the free exercise of Native religion, based on the First Amendment, and to accommodate access to and use of religious sites to the extent that the use is practicable and is not inconsistent with an agency's essential functions. The Act, recognized the "inherent right" of American citizens to religious freedom; admitted that in the past the US. government had not protected the religious freedom of American Indians; proclaimed the "indispensable and irreplaceable" role of religious "as an integral part of Indian life:" and called upon governmental agencies to "protect and preserve for American Indians the inherent right of freedom to believe, express, and exercise the traditional religions." The resolution referred specifically to Indians' access to sacred sites, the use of natural resources normally protected by conservation laws, and participation in traditional Indian ceremonies. The Act, AJRFA enacted at a high-water mark of federal concern of for American Indians, a time when U.S. policy-makers were recognizing the validity of Indian claims to land and sovereignty and were acknowledging the history of U.S. mistreatment of Indian Tribes. Progressives, who saw government as an instrument for assisting the disadvantaged, passed AIRFA as a corrective measure. The Native American Graves Protection an Repatriation Act, P.L. 601-101, was passed by the Congress in 1990. It requires the accurate identification, reintegration, and well documented transfer to affiliated descendants of all remains of Native American Ancestry, etc. In Great Basin, RMP planning area, thousands of artifacts, skeletal remains, and related objects are preserved; sacred ceremonial sites are within this area, etc.
2. The SHPO suggests that the certain sensitive areas, such as Grimes Point and Sand Mountain should be considered for elevated protection such as an Area of Critical Environmental Concern for their significant cultural and environmental values.
3. The SHPO suggests that the existing VRM classes for culturally-significant locations (such as the Comstock NHL, properties of traditional religious and cultural significance, National Historic Trails, State Parks, etc.) should take into consideration the sensitivity and importance of the viewshed and setting of these resources
1. The SHPO supports the BLM's efforts to consult with Native American tribes and recommends that the identification of properties of a traditional religious and cultural significance should be included in these efforts.
This is a response to your memoranda of April 18, 2012, and public comments due to BLM, April 201 2, in regard to the RMP. The mountain ranges of concern are the Stillwater Mtns., Sand Mountain areas, Clan Alpine Mtns., Desatoya Mtns., etc. in Central Nevada.

ISSUE 5: VISUAL RESOURCE MANAGEMENT

Table C-9
Visual Resource Management

3. The SHPO suggests that the existing VRM classes for culturally-significant locations (such as the Comstock NHL, properties of traditional religious and cultural significance, National Historic Trails, State Parks, etc.) should take into consideration the sensitivity and importance of the viewshed and setting of these resources
In addition, the following mitigation measures should be employed. Utilize building materials, colors and site placement that are compatible with the natural environment: Utilize consistent mitigation measures that address logical placement of improvements and use of appropriate screening and structure colors. Existing utility corridors, roads and areas of disturbed land should be utilized wherever possible. Proliferation of new roads should be avoided. For example, the use of compatible paint colors on structures reduces the visual impacts of the built environment. Using screening, careful site placement, and cognitive use of earth-tone colors/materials that match the environment improve the user experience for others who might have different values than what is fostered by built environment activities. Federal agencies should require these mitigation measures as conditions of approval for all permanent and temporary applications.
Utilize appropriate lighting: Utilize consistent lighting mitigation measures that follow "Dark Sky" lighting practices. Effective lighting should have screens that do not allow the bulb to shine up or out. All proposed lighting shall be located to avoid light pollution onto any adjacent lands as viewed from a distance. All lighting fixtures shall be hooded and shielded, face downward, located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas. A lighting plan should be submitted indicating the types of lighting and fixtures, the locations of fixtures, lumens of lighting, and the areas illuminated by the lighting plan. Any required FAA lighting should be consolidated and minimized wherever possible.
The Nevada Division of State Lands and the State Land Use Planning Agency offer the following comments: Multiple use activities on Nevada's public lands are supported and encouraged. Please consider the cumulative visual impacts to public lands users' experiences from certain activities (temporary and permanent). Some notable activities include proliferation of new roads, poorly-sited and designed structures, lack of co-location of infrastructure and improper lighting, to name a few.
All lands will be managed as VRM 1 or 2.

Table C-9
Visual Resource Management

Without the respect of the human population this will vanish. I propose that the human population be allowed on these public lands in particular all WH&B HA lands as a visitor and nothing more. In addition, for visual resources to continue, all selling and leasing of public lands must cease.
Scoping Handout - 3.2 Visual Resource Management Beauty is in the eye of the beholder and the Carson City District has a unique visual resource found in few other places in America. There are no non-valuable visual areas within the district. The visual value includes the snow-capped peaks to the flat desert and the oasis-like springs and the juniper and pinyon and sage wild climax species areas and the wildlife including the predator species and the wild horses and burros and sage grouse and tortoise and migratory birds and spiders and snakes and on and on. All natural elements combine to make this CC district visually unique and valuable.

ISSUE 6: SPECIAL STATUS SPECIES-WILDLIFE

Table C-10
Special Status Wildlife

Sage-Grouse
Greater Sage Grouse: Improved management and protection of the declining and candidate species of Greater Sage Grouse is perhaps the most difficult challenge for the BLM in the CCD. We strongly agree with BLM Nevada State Director, Amy Leuders, that continuing current BLM management practices will result in further loss and fragmentation of Greater Sage Grouse habitat on public lands which has already resulted in the listing of this species by the US Fish & Wildlife Service as a candidate species and evaluation by 2015 of its listing as endangered or threatened under the Endangered Species Act. We are attaching the March 22, 2012 Toiyabe Chapter comments (via email and hard copy) regarding the BLM/US Forest Service EIS on Greater Sage Grouse and ask that these comments be incorporated into the CCD RMP process.
e. Threaten and Endangered/Sensitive Species. Evaluate the impacts of horses and burros on other species. Adjust number to reduce this impact. Some possible areas of concern would include the Wasuk HMA and sage grouse late brooding habitat in the Mount Grant PMU. Other conflict might include spring snail habitat and horse impacts to spring sources.
7-c. ISSUE: The proposed Conservation Measures fail to describe the crucial difference between sagebrush habitats that are in good ecological condition vs. sagebrush habitat in poor ecological condition. All of the recommendations concerning managing or restoring the sagebrush habitat type talk about achieving a minimum 50-70% cover for the sagebrush. Some mention is made of sagebrush communities (the understory), but this is never described adequately, even in the Appendix. There can be two choices of sagebrush habitat and understory. In one choice, native grasses, forbs and other shrubs dominate the remaining 30-50% composition of the understory. In the other choice, the remaining 30-50% is dominated by exotics such as cheat grass, annual weeds, and bare ground. The first can support healthy sage grouse numbers, the other can't. Without explicit descriptions, managers and project proponents can choose to save sagebrush areas that have no value to sage grouse.

Table C-10
Special Status Wildlife

No Grazing Alternative

BLM must fully analyze environmental effects of the No Grazing Alternative. This analysis is essential to set a solid comparative effects baseline and fully understand the significant ecological toll of any continued grazing use. Yet we fear that BLM is highly unlikely to adopt this across the entire landscape due to entrenched agency mindsets. It must be adopted in ACEC areas. We have proposed ACECs in association with the sagegrouse EIS, and request that you also consider those here. We request that all sage-grouse ACEC proposals submitted for that process be carried forward in this RMP - in case that process gets delayed or otherwise goes astray. Grazing permit retirement must be undertaken, and the Land Use Plan must achieve this. Permit retirement is necessary under all alternatives.

General

7-a. ISSUE: The proposed Conservation Measures statement "Priority sage-grouse habitats ...areas have been, or will be identified by state fish and wildlife agencies in coordination with respective BLM offices" allows an unprecedented situation of having the State dictate habitat management on lands under federal jurisdiction.

Priority habitat speaks of the land - not the animal. The federal land management agencies are responsible for the habitat-the land, with the state being responsible for the actual animal with the exception of where ESA listed species occurred. The State ultimately doesn't have the legal responsibility for the habitat; will incur no cost from having to fund the conservation measures on public land nor will the State incur cost from the future lawsuits.

NEPA PROCESS

9. ISSUE: Private and foreign contract military personnel operate without NEPA or permitting.

I recently had a conversation with a packer who rented mules to a military entity for specialized troop training (mules are used in Afghanistan). The animals were being used in the south central portion of the CCDO. That area has already seen desert bighorn guzzlers used as ambush blinds in "military" games. Public users have been stopped by "military" personnel on public lands roads. Private, for-hire contract military personnel use CCDO to train private troops / security personnel. Private contract military personnel have been in CCDO to discuss use of public lands, but their activities were never analyzed, no stipulations / mitigation given and no permit for use issued.

The use of wildlife guzzlers is one example of potential impacts. Sportsmen's groups, the state and the BLM have spent thousands of dollars on bighorn guzzlers in order to try to maintain this native species. If bighorn are disallowed the ability to drink or are conditioned to avoid guzzlers or even shot at, an American resource is being damaged. If a mule pack train travels through a bighorn lambing ground or sage grouse lek, these activities could be impacted. The extent of this issue is unknown because the activity hasn't been analyzed. In New Mexico, the USFS has put Air Force PJ training under a special use permit that has worked for all concerned. If they can do it, certainly CCDO can do it for private military people who are simply public land users.

WILDLIFE / SENSITIVE SPECIES

7. ISSUE: The Bi-state Sage Grouse Conservation Measures proposed for incorporation in the revised CCDO RMP raise issues that need to be addressed -see attached.

Conservation Measures for the Bi-state sage grouse populations are similar to those written for the Greater Sage Grouse Populations in the western U.S. These will have no public review prior to being recommended for incorporation into the revised CCDO RMP. The Measures raised issues for the Greater populations; some of the same issues apply to the Bi-state populations. These issues need to be included and addressed in the updated CCDO RMP. Issues specific to the Bi-state sage grouse populations located within the CCDO are shown after issue #10.

Table C-10
Special Status Wildlife

RECREATION / OHV (Hunting, Fishing, Hiking, Biking etc)
6. ISSUE: OHV track / trail mileage has increased exponentially, creating a web of trails, tracks and roads
There has been an exponential increase in miles of OHV tracks / trails. In the lower west Pine Nut range, OHV tracks can be found on and in nearly every ridge and drainage, and on many hills. Many hills have parallel OHV trails on them, located just a few yards apart. The Sunrise Pass road now has a deep OHV trail paralleling it that didn't exist just a couple of years ago. Each OHV rider wants to ride in virgin country, blazing their own trail. The definition of "access" for many OHV users means cutting a new trail every time they're out. Every spring site in the Pine Nuts has at least an OHV trail to it which allows disturbance for deer fawn rearing and sage grouse brooding. Trails fragment many types of wildlife habitat which affects species diversity and help spread noxious weeds. Trails allow soil erosion to occur which eventually turn the trails into deep cuts that are impassible -creating a reason to make new OHV trails. During a recent attempt at an inventory of tracks / trails / roads in one area of the CCDO, the increase was so rapid, the inventory couldn't keep pace. It's nearly impossible to write effective regulations limiting OHV use to existing trails because new ones are created every day and are "existing" by nightfall. The problem has become especially bad since the USFS in California and part of Nevada closed its road system to OHV use except where posted open. The CCDO with specific areas like the Pine Nut Range is receiving unprecedented use from riders blocked from USFS lands

Recreation:The Carson City District (CCD) recreation program is very important to the densely populated areas in Western Nevada as well as to more rural areas. The RMP should address urban interface issues as more and more citizens take advantage of recreation on public lands, with the attendant impacts on wildlife habitat, fire and public safety, and other resources. Recreation permits should not be issued or should be revised to include seasonal restrictions to protect critical wildlife habitat areas or seasonal uses, such as Sage Grouse leks and nesting areas

4. Environmental Issues
A. Sage Grouse is the 800 pound gorilla.
  i. The spotted owl and desert tortoise has taught us that prohibiting human activity does not solve the problem.
    1. Closing off areas to preserve spotted owl/desert tortoise habitat has not brought about a recovery of species population
    2. Closing off areas has taught us pressure on the endangered species is coming from threats that have nothing to do with human activity.
  A. Increase in barn owl populations are biggest threat to spotted owls.
  B. Ravens and other predators are biggest threat to desert tortoises.
  Ii. Fortunately OHV is at the bottom of the scale for threats to the sage grouse.
    3. Doesn't require area closures.
    4. Can be managed by re-routing of existing roads and trails
    5. Can be managed by seasonal closures.
  Iii. OHV enthusiasts are ready to partner in any activity that helps improve sage grouse habitat.

Wild Horses and Burros
Friends of Nevada Wilderness is committed to protecting Nevada's wilderness study areas and other lands with wilderness character. We are also concerned about the health of wild horses, wildlife and their habitats. When horse numbers increase above levels the land can support, wilderness values can suffer as can overall health of our public lands. When horse numbers reach unsustainable levels, we are not only concerned about damage to the sagebrush community and competition with native wildlife such as sage-grouse, but we are also very much concerned about the current and future health of the horses themselves. Because wild horses in Nevada have no natural predators, we understand that active management can be necessary to maintain the herds at humanely sustainable levels, without destroying the land that sustains them. We support the RMP making decisions that will keep both our wild horses healthy and our public lands and wildlife healthy.

Table C-10
Special Status Wildlife

7-d. ISSUE: The proposed Conservation Measures fail to address pinyon-juniper (woodland) encroachment into sagebrush / sage grouse habitat as an important issue needing specific recommendations for the Great Basin physiographic area which includes the CCDO.
Woodland encroachment is one of the most intractable problems facing sage grouse habitat management in the Great Basin. There is an extensive body of research and research publications concerning the history of woodlands in this physiographic area and the Colorado Plateau. Climate / carbon cycle changes, interruption of natural fire cycles, changes in class of grazing livestock and historic recovery of fuel wood areas have all contributed to an increase in the stocking rate and acreage dominated by woodlands. Water source and understory vegetation losses due to encroaching woodland areas have been researched and documented for many years. Woodland encroachment into sage grouse nesting / brooding (riparian area) habitat and connective habitat continues to make these areas less than ideal or unusable for sage grouse. Although CCDO has programs for woodland management, treatment is expensive and fraught with regulation on larger areas. Treatment of larger areas is usually the only way to create a significant benefit for a species like sage grouse. Whithout specific management objectives in sagebrush / woodland interface areas, crucial sage grouse habitat will be lost.

We specifically request that any future renewable energy development within the CCD address the following concerns:
o Be consistent with the direction and intent of the Nevada Energy and Infrastructure Development Standards to Conserve Greater-Sage Grouse Populations and Their Habitats4
o Minimize the projects' ecological footprints; site renewable projects on previously disturbed lands;
o Avoid steep slopes in order to reduce erosion impacts;
o Avoid sensitive and rare natural communities;
o Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors;
o Require structures that discourage perching by raptors;
o Avoid fly-ways, especially for raptors;
o Avoid development of priority areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, regional conservation plans, recovery plan needs for threatened and endangered species, and Audubon IBAs;
o Avoid impacts to species of plants and animals listed under the state administrative code and the ESA;
o Avoid local, state, or federally protected lands;
o Minimize growth-inducing impacts;
o Be consistent with the conservation priorities of existing land management and conservation plans;
o Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities;
o Minimize cumulative impacts due to existing and planned development in the region;
o Actively restore native vegetation to the project footprints after the infrastructure has been constructed.

4 http://ndow.org/wild/conservation/sg/resources/nevada_energy_standards_for_sage-grouse_2010.pdf

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Fire Management: We suggest that BLM use clear-cutting to protect public lands from the encroachment of houses in the urban interface areas and the associated fire danger from these urban infringements; otherwise, the public will continue to pay for the costs of protecting private structures adjacent to public lands and, in effect, subsidizing private urban development. The RMP should evaluate the long-term effects of fire suppression on forest health and public safety and theuse of prescribed fires to achieve healthy woodlands in the CCD area. Intact sagebrush areas should be retained for Sage Grouse, not burned and not "green-stripped" or otherwise destroyed in the name of fire "protection." Any stripping should occur directly adjacent to private property. The RMP should evaluate the benefits and costs of the use of green stripping and other fire prevention activities in critical wildlife habitat areas in order to avoid further fragmentation of intact sagebrush areas.

Table C-10
Special Status Wildlife

Travel Management: Managing vehicular use of public lands and avoiding, minimizing and mitigating adverse impacts of motor vehicles is a critical element of the RMP. While the Sierra Club strongly supports access to public lands, it also is concerned about the harmful effects of off-road travel, especially on erosion, riparian area conditions, the spread of invasive weeds, and impacts on Sage Grouse and other wildlife. Sierra Club members are both vehicular and non-vehicular users of the public lands. We urge the BLM to follow its travel management process to develop road and trail maps in the CCD through a public process. These routes should avoid or minimize destruction and fragmentation of wildlife habitats. Redundant or unneeded roads should be closed. Seasonal restrictions should be imposed to lessen impacts on Sage Grouse leks. We especially support signing roads and trails open, as the previous attempts to sign roads "closed" has simply resulted in the destruction of closed signs. Areas to be closed or restricted include core priority habitat areas for Sage Grouse and all habitat for threatened, endangered and sensitive species (TES) in the CCD. Presently, roads and trails appear adequate for the CCD area, but this may change in the future with increased population, increased unacceptable impacts, and the need for increased protection of the habitat of TES species.
We also propose that you consider establishing new ACECs in the following areas: -All areas identified as Essential or Important for the Sage Grouse The Nevada Department of Wildlife along with other state and federal agencies has produced a baseline map showing habitat considered to be "essential" or "important" for the survival and viability of sage grouse populations in Nevada. These designations are also referred to as Category 1 and Category 2, respectively.1 Scoping map 5.1, shows the location of these areas within the Carson City District ("CCD"). While the purpose of this mapping exercise is not for use at the project level due to the scale involved, it most certainly is applicable at the level of a RMP revision. 1 For details and a description, go to: http://ndow.org/wild/conservation/sg/
The Center is particularly interested in seeing that special consideration and protections be afforded to sage grouse, a species found to be warranted for protections under the Endangered Species Act, but precluded at this time due to lack of agency capacity. Critical sage grouse habitats such as leks, nesting and winter range should be a priority for protection in the RMP.
Targeted active restoration actions that focus on removal of disturbances or developments promoting degradation such as sources for weed invasion and spread or that are promoting degradation of habitat components or diseases must be considered, as well. This is a very complex and important landscape that is under great threat from livestock degradation. See Mack and Thompson (1982), Fleischner et al. 1994, Ohmart 1996, Belsky et al. 1999, Knick et al. 2003, Dobkin and Sauder 2004, Connelly et al. 2004 Conservation Assessment for Greater Sage-grouse, Knick and Connelly 2009/2011 Studies in Avian Biology Chapters, USFWS Warranted But Precluded March 2010 finding for greater sagegrouse, recent BLM Instructions memos and sage-grouse habitat mapping, recent state sagegrouse plan and map iterations, and conservation planning documents. See also Interior Columbia Basin Ecosystem Sciences documents that highlight ecological concerns in the sagebrush and arid lands biomes. Example: Wisdom et al. (2002). See Great Basin and Nevada Rangeland Health Assessments conducted by BLM in mid-2000s, but that did not fully consider grazing's adverse impacts.
Sage-Grouse Populations Carson City BLM lands include both bi-state (Mono Basin) and other populations. It is imperative that all sage-grouse habitats be protected and expanded under this RMP effort, as numbers of birds are very low - and some PMUs are nearing extirpation in Carson City lands. Viability of local and regional populations must be fully examined here. What actions are necessary to prevent extirpation? How can these be accelerated in this process –perhaps by immediately moving forward with a targeted RMP amendment to address imminent extinction and irreparable harm?
I do not want to see the Sage Grouse used as a reason to restrict OHV use on BLM land, it is indicated on the list of threats as having a low impact on the Sage Grouse.

Table C-10
Special Status Wildlife

Seasons of Use No grazing will be allowed in sage-grouse habitat during lek and nesting periods. This period is March 1 through June 20 or later. This must be applied to all sagebrush habitats, and to protect nesting migratory birds as well, and pygmy rabbits with young in shallow natal burrows. These habitats must be fully identified as part of the current process. Every effort must be made to avoid grazing areas critical for brood rearing, as well. No grazing will be allowed in sage-grouse habitat during winter periods. This must be applied to all sagebrush habitats. These habitats must be fully identified as part of the current process. This protects birds from disturbance and displacement by livestock management activities. In all instances of avoidance, livestock use must not be shifted and intensified into other fragile sites or vegetation communities, or other rare species impacted.
Areas back from the green line must be measured and monitored and these standards applied in these areas, too. Mesic and meadow areas that are not right by the water's edge are much less likely to regrow - yet are critical for protecting and conserving vital watershed values, and protecting riparian/meadow areas linked to aquatic habitat health. They are essential to provide sage-grouse brood rearing and recovery of habitat components for species. Agencies have long biased monitoring of impacts by measuring only the thin greenline right by the water's edge, thus examining species likely to regrow following heavy grazing rather than the vegetation in the adjacent riparian/meadow area which provides suitable conditions for the forbs required by sage-grouse broods. See for example, Ohmart (1996), Belsky et al. (1998).
For any remaining grazed lands: The use levels that must be applied leave must 9 inches of residual native grass cover across understory communities. This must be based on the native perennial grasses that are present. It must be based on sites, especially deeper soil sites and sites actually used to a considerable degree by livestock -not on cherry-picked sites distant from water where larger statured grasses may remain in depleted landscapes. Only one grazing disturbance bout can be allowed. Otherwise, "double dipping" -or repeated use occurs which is harmful to sage-grouse and vegetation. Under repeated grazing bouts in the same year, total use may significantly exceed a percentage allowed for one period use - due to plants re-growing between bouts. Trailing should not be allowed back through areas that have been grazed.
ACECs: The Sierra Club strongly supports the designation of ACECs or other wildlife management areas for all core habitat of the Greater Sage Grouse in the CCD. Biologists from the Nevada Department of Wildlife and the BLM are currently mapping these core areas. Other critical wildlife areas should also be evaluated for ACECs, including Important Bird Areas in the CCD (see Lahontan Audubon website for IBA descriptions: http://www.nevadaaudubon.org/bookstore.html#iba).

Table C-10
Special Status Wildlife

ACEC Proposal: Bi--State PMU's ACEC Proposal BLM must designate ACECs that protect occupied sage--grouse habitats across the landscape that are necessary for sage--grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas. FLPMA directs the secretary of the Interior to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values ...giving priority to ACECs..." ACECs are to be designated in areas "where special management attention is needed to protect and prevent irreparable damage to important historic, cultural and scenic values; fish, wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards." (43 USC § 1702(a) 43 CFR 1601.0--5a).
Game Management NDOW is a Cooperating Agency in the Greater Sage-grouse EIS. We will defer comments at this time but will continue to participate in that process.
I think hunting of sage grouse should be banned until they are nit longer close to being listed on the endangered species list.
Just as solar energy farms in other BLM Areas are allowed to relocate the desert tortoise, new energy installations should be permitted to relocate the sage grouse, if it allows the new green energy to be built.
I was concerned to see the Sage Grouse Critical Area shown in the Sugarloaf/Vinegar Peak area. I have never seen any sage grouse in this entire area in 15 years of weekly riding. The presence of ideal habitat does not represent a bird population and I do not believe there is any real population there. Regardless, the critical habitat area is not sufficient grounds to restrict access.
4. The SHPO notes that some culturally-significant resources, such as Mount Grant, are also located in important habitat for the bistate Sage Grouse. The SHPO recommends that efforts to conserve this important habitat could also contribute to the preservation of this culturally important location.
Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area.

Table C-10
Special Status Wildlife

Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long--term Viability for Sage--grouse and Other Sagebrush--dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations.
These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.
Loss of this PMU would further isolate sage--grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse.
Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage--grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage--grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations.
7-b. ISSUE: The proposed Conservation Measures fail to address the topic of patch size in relation to sage grouse habitat. Habitat patch size can be critical for the survival of species that are affected by this phenomenon. OHV trails, two-track roads, ROW's and other structures that chop contiguous vegetation types (habitat) into small pieces must be evaluated with respect to the minimum size of a particular habitat needed by sage grouse to complete their life cycle. The general section of the proposed Conservation Measures hints at patch size, but doesn't really discuss the concept. If patch size isn't an issue, it should be stated in the Conservation Measures. Disregarding patch size can cause the decline or loss of a wildlife population as surely as outright destruction. If patch size science for sage grouse is unknown, the agency can't just say "Oh well."

Table C-10
Special Status Wildlife

Sage--grouse ACECs: Protect the complex of seasonal habitats required by sage--grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage--grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats.
7-p. ISSUE: The proposed Conservation Measures fail to address a process for incorporating new information in a timely manner. There is crucial sage grouse habitat that occurs outside the PMU maps that have been drawn by the State. There are bird sightings that have not been accounted for in existing PMU's that have a high probability of being associated with crucial habitat not fully described or delineated. Until habitat connectivity and the potential for sage grouse populations to follow source and sink population science are known, no sage grouse occurrence, lek or habitat can be ignored in order to avoid federal listing and legal challenges, and possibly for species survival. The NDOW hasn't been willing in the past to re-open the PMU maps nor have they been willing to look into sightings that could be significant. Not addressing these areas is unacceptable and puts the BLM at risk for challenge. CCDO needs to include language in the RMP concerning inclusion of new or status undetermined sage grouse information. The Conservation Measures don't allow for any known sage grouse areas or sightings to be ignored or taken off the books because it's messy, or the agencies don't have time, or the area seems insignificant. But these Measures also don't address new or unaccounted for information. Every sage grouse area has to be accounted for.
Range Management 7-f. ISSUE: The proposed Conservation Measures fail to include a discussion of the conversion of sheep dominant grazing to cattle dominant grazing on public land as being a potential indirect impact on sage grouse and their habitat. In Nevada and throughout much the West, there has been a shift in the dominant domestic livestock grazer on public lands. Not long ago, domestic sheep were the most common permitted livestock on grazing allotments in the CCDO. Domestic sheep closely mimicked the predominant historic grazer - wild bighorn sheep. Economic and other factors caused the gradual switch to cattle. This has and will have an important effect on the rangeland with sage grouse habitat. Cattle select grasses and forbs as the preferred forage. Cattle often stay in one area, eating until the understory is gone, or the cattle are removed. Under cattle grazing over time, rangelands become dominated by "increaser" shrubs and encroaching woodlands as "decreaser" understory species, choice native grasses and forbs are used. Domestic sheep however, eat little bits of grasses, forbs, shrubs and small pinyon-juniper trees that can keep a vegetation community more balanced. Additionally, domestic sheep are herded daily and can easily be rotated throughout a pasture / allotment. Cattle are occasionally pushed, certainly not daily, and often return to an area already grazed. Domestic sheep grazing may assist in maintaining sage grouse food items such as ants and certain forbs for chicks. In eastern Nevada, when the majority of grazing allotments had domestic sheep rather than cattle (pre-1980-90's), sage grouse numbers were strong and fluctuated within a normal range.
7-g. ISSUE: Yearlong livestock grazing that is allowed on the CCDO has a negative effect on sage grouse and their habitat and needs to be addressed in the RMP. See discussion in issue #4 related to livestock grazing.
Habitat Restoration 7-k. ISSUE: Use of late / high seral vegetation descriptions as the standard for land management agencies sage grouse management causes important habitat areas to be ignored

Table C-10
Special Status Wildlife

7-l. ISSUE : Use of standard NRCS and other vegetation mapping that has too coarse a filter to pick up crucial riparian microsites causing important sage grouse areas in Nevada / CCDO to be ignored
Good condition mid-seral and low / early seral vegetation are as important to sage grouse as high / late seral vegetation to supply all of their life cycle needs. However, for example, Natural Resource Conservation Service (NRCS) soil / vegetation mapping has typically been used as a standard for rangeland management in BLM and is recommended in the Conservation Measures. NRCS vegetation typing is done using high / late seral vegetation as the standard. It is generally silent on describing low / early and mid seral vegetation that is important for grouse and important for habitat enhancement objectives. Are we sure that the greatest abundance of forbs and insects needed by sage grouse isn't produced in a good condition / low-early seral vegetation community? By using NRCS descriptions, CCDO will be managing exclusively for high seral vegetation communities. Additionally, references like NRCS don't break out the numerous small acreage riparian areas that are crucial to sage grouse for brood rearing and connectivity habitat in more arid areas. By not considering these aspects, important habitat will be ignored, areas with high potential for enhancement will be passed over and Bi-state sage grouse habitat will ultimately be lost.

7-m. ISSUE: The proposed Conservation Measures fail to convey a difference in sagebrush habitat that is in good ecological condition vs. sagebrush habitat in poor ecological condition.See 7-c discussion.

The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock--
associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology.

Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage--grouse habitats of the ACEC.

7-p. ISSUE: The proposed Conservation Measures fail to address a process for incorporating new information in a timely manner.
There is crucial sage grouse habitat that occurs outside the PMU maps that have been drawn by the State. There are bird sightings that have not been accounted for in existing PMU's that have a high probability of being associated with crucial habitat not fully described or delineated. Until habitat connectivity and the potential for sage grouse populations to follow source and sink population science are known, no sage grouse occurrence, lek or habitat can be ignored in order to avoid federal listing and legal challenges, and possibly for species survival. The NDOW hasn't been willing in the past to re-open the PMU maps nor have they been willing to look into sightings that could be significant. Not addressing these areas is unacceptable and puts the BLM at risk for challenge. CCDO needs to include language in the RMP concerning inclusion of new or status undetermined sage grouse information. The Conservation Measures don't allow for any known sage grouse areas or sightings to be ignored or taken off the books because it's messy, or the agencies don't have time, or the area seems insignificant. But these Measures also don't address new or unaccounted for information. Every sage grouse area has to be accounted for.

Table C-10
Special Status Wildlife

Recreation

7-e. ISSUE: The proposed Conservation Measures fail to address impacts of individual OHV trails and subsequent two-track roads that impact sage grouse and sage grouse habitat.

Discrete anthropogenic disturbance via highways and gravel roads has been identified as an important issue for sage grouse habitat in the Conservation Measures. Overall objectives talk about limiting roads and specific objectives talk to limiting road disturbance to 3%. The Conservation Measures overlook the impact of OHV trails left by individuals using public and USFS administered lands. Are these really to be categorized in the Measures as diffuse disturbances, along with livestock grazing? Individual user OHV trails mechanically damage sagebrush, disturb nesting and brooding, destroy riparian vegetation and drain wet areas through capillary action. In low-mid elevation areas, OHV trails lace and grid every drainage and ridgeline. Many of these trails become roads. Low elevation lands are a dirt trail / road web of fragmented, small polygon areas that can't function as sage grouse habitat. Nearly every low-mid elevation riparian area in Nevada potentially used by sage grouse for brooding is impacted by individual use OHV trails on BLM lands. Individual OHV trail / roads systems force the issue of discussion on patch size. The case can't be made that webs of OHV trails and two-track roads don't impact sage grouse and sage grouse habitat no matter which label, discrete or diffuse, these fall under. This issue must be addressed specifically for sage grouse.

Monitoring

7-o. ISSUE: In the Conservation Measures, the State is charged with sage grouse population and habitat inventory; it is impossible for the State to perform this in a way that will get information to the federal agencies in a timely manner. As written, the Measures will prompt managers to disallow much time being spent by federal biologists on habitat inventory.

It is appropriate for NDOW biologists to do official sage grouse counts. NDOW biologists should do what they can for habitat inventory; however their agency objectives, time and money won't allow that type of inventory to be done the extent needed by the BLM and CCDO. The problem is that NDOW counts sage grouse from a helicopter as part of the mule deer census. This is done along the same grid year after year. New sage grouse grounds or satellite grounds are not sought during breeding season or other times of the year when these flights are made; there is only so much money, time and personnel. NDOW doesn't spend much time at all on the ground doing inventory for brood rearing habitat, winter habitat, connective habitat etc. It is highly likely for a federal biologist to be in the field reviewing an activity that is due for decision and discover sage grouse use. Will the BLM ignore this or not let the information be included in analysis because the NDOW didn't do the work? This opens the door to challenge of BLM.

Wildlife - Special Status Wildlife

Travel Management: Managing vehicular use of public lands and avoiding, minimizing and mitigating adverse impacts of motor vehicles is a critical element of the RMP. While the Sierra Club strongly supports access to public lands, it also is concerned about the harmful effects of off-road travel, especially on erosion, riparian area conditions, the spread of invasive weeds, and impacts on Sage Grouse and other wildlife. Sierra Club members are both vehicular and non-vehicular users of the public lands. We urge the BLM to follow its travel management process to develop road and trail maps in the CCD through a public process. These routes should avoid or minimize destruction and fragmentation of wildlife habitats. Redundant or unneeded roads should be closed. Seasonal restrictions should be imposed to lessen impacts on Sage Grouse leks. We especially support signing roads and trails open, as the previous attempts to sign roads "closed" has simply resulted in the destruction of closed signs. Areas to be closed or restricted include core priority habitat areas for Sage Grouse and all habitat for threatened, endangered and sensitive species (TES) in the CCD. Presently, roads and trails appear adequate for the CCD area, but this may change in the future with increased population, increased unacceptable impacts, and the need for increased protection of the habitat of TES species.

Table C-10
Special Status Wildlife

Geothermal and other Renewable Energy Resources: Geothermal leases should not be granted in areas of core priority Sage Grouse habitat, including leks and nesting areas. Wind energy proposals should be evaluated for potential impacts on Golden and Bald Eagles nests and breeding pair territories before applications are accepted in order to avoid locations with dense eagle populations. The mountain ranges around Virginia City such as the Flowery Range, Pine Nut Range and Virginia Range should be excluded from wind development to avoid adverse impacts to eagles.
Mineral Resources: Core priority habitats for Greater Sage Grouse and other TES species should be withdrawn from mineral entry. Seasonal and other restrictions should be required as conditions of permit approval to protect other wildlife habitat and cultural resources.
ACECs: The Sierra Club strongly supports the designation of ACECs or other wildlife management areas for all core habitat of the Greater Sage Grouse in the CCD. Biologists from the Nevada Department of Wildlife and the BLM are currently mapping these core areas. Other critical wildlife areas should also be evaluated for ACECs, including Important Bird Areas in the CCD (see Lahontan Audubon website for IBA descriptions: http://www.nevadaaudubon.org/bookstore.html#iba).
The BLM must gather and analyze baseline data that is needed to fully understand the direct, indirect, and cumulative effects of its decision. The NEPA requires BLM to "describe the environment of the areas to be affected or created by the alternatives under consideration." 49 C.F.R. ss 1502.15. In Half Moon Bay Fisherman's Marketing Ass'n v. Carlucci, 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit stated that "without establishing . . . Baseline conditions . . . There is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA." The analysis must include information regarding the current status, population trends, or effects of current management on species protected under the Endangered Species Act ("ESA"), candidates for listing, or species imperiled and protected by the State of Nevada or under the BLM's directives contained in Manual 6840.2 regarding BLM sensitive species.
You are asking for another Sagebrush Rebellion. Oh yeah, you let all the sagebrush in our beautiful state burn to the ground and now we have an endangered species for you to use as an excuse to take away our land. Here is a good rule of thumb. If it ain't broke don't fix it. Stay out of the land business and stick to putting out fires when they start. That will help us out more than any of your land grabbing laws aimed to keep us from using the land that we love.
3. The RMP/EIS Must Comply with the ESA and Meet BLM Sensitive Species Policies Pursuant to ESA Section 7(a)(1) federal agencies have an affirmative duty to conserve endangered and threatened species occurring within their jurisdiction. ESA Section 7 (a)(2) and its implementing regulations require federal agencies to insure that any action they take is not likely to jeopardize the continued existence of adversely modify the critical habitat of any listed species. The ESA further requires that any action that may affect listed species must be made in consultation with the U.S. Fish and Wildlife Service.
We recommend that the RMP outline the circumstances that necessitate ESA re-consultation at the RMP level and the circumstances that necessitate ESA consultation (whether formal or informal) at the implementation planning and decision-making levels. The BLM should complete inventories to fill any gaps in its knowledge of special status species and periodically re-inventory populations to determine status and trends. A goal of the BLM should be to ensure the conservation and recovery of threatened and endangered species, special status species, and designated critical habitat within the resource area. BLM should designate protected activity centers around known species. BLM should manage visitation and use, particularly motorized, by limiting activities and closing certain areas to prevent impacts (i.e., theft and disturbance) to sensitive species.

Table C-10
Special Status Wildlife

Areas Identified as Nevada Highest Priority Conservation Sites
In 2006, the State of Nevada Natural Heritage Program published its list of "Highest Priority Conservation Sites ("Scorecard").2 Through this process, the State identified its highest priorities for the conservation of biological diversity within its borders. Sites are re-evaluated on a periodic basis and individual sites may be added or dropped. All sites are included as highest priorities because each contains one or more critically imperiled species - that is, these are places where a single event from threatening or destructive forces may cause serious population loss or irretrievable degradation of habitat, possibly leading to extirpation or extinction.

The CCD contains several of these sites and the BLM should consult the above referenced document and consult more closely with the Nevada State Heritage Program on precise locations and boundaries. Some such areas include:
o Sand Mountain
o Cain Springs
o Coyote Springs
o Warm Springs Valley
o Panther/Sun Valley
o Churchill Narrows, and possibly others.

2 Nevada Natural Heritage Program. 2006. Scorecard 2006: Highest Priority Conservation Sites. Carson City, Nevada. Available at: http://heritage.nv.gov/reports/scor2006.pdf .

5. Renewable Energy Projects
The development of renewable energy is a critical component of efforts to reduce carbon pollution and climate-warming gases, avoid the worst consequences of global warming, and to assist in meeting needed emission reductions. The Center strongly supports the development of renewable energy production, and the generation of electricity from solar power, in particular. However, like any project, proposed solar power projects should be thoughtfully planned to minimize impacts to the environment. In particular, renewable energy projects should avoid impacts to sensitive species and habitat, and should be sited in proximity to the areas of electricity end-use in order to reduce the need for extensive new transmission corridors and the efficiency loss associated with extended energy transmission. Only by maintaining the highest environmental standards with regard to local impacts, and effects on species and habitat, can renewable energy production be truly sustainable.

Of primary concern are the impacts of renewable energy projects on listed, candidate and other imperiled species.
The majority of the plans of development for solar projects to date have called for mass grading and/or vegetative clearance from the project site. Obviously this causes a horrific toll on the plants and animals residing on the site. Unfortunately, the same terrain characteristics favored by many species of concern are likewise the primary target area for solar and wind energy projects.

Another concern related to renewable energy development, particularly solar and geothermal is the water needs for the development and operation of the site. Cooling for concentrated solar facilities, cleaning of photovoltaic mirrors, and water to support geothermal wells can consume thousands of acre feet every year. Being the driest state in the country, Nevada does not have an abundance of water for such uses. Lacking surface water resources, most of the water needed to support renewable energy projects is demanded from groundwater well. Many basins in Nevada are already over appropriated and pumping from them is already threatening seeps and springs and the species that depend upon them, such as rare desert fish and springsnails.

We hope BLM will avoid geothermal, solar and wind energy development in areas and habitats where such development will not be compatible with the habitats for listed or candidate species (both federal and state), and BLM special status species.

Table C-10
Special Status Wildlife

We specifically request that any future renewable energy development within the CCD address the following concerns:
o Be consistent with the direction and intent of the Nevada Energy and Infrastructure Development Standards to Conserve Greater-Sage Grouse Populations and Their Habitats4
o Minimize the projects' ecological footprints; site renewable projects on previously disturbed lands;
o Avoid steep slopes in order to reduce erosion impacts;
o Avoid sensitive and rare natural communities;
o Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors;
o Require structures that discourage perching by raptors;
o Avoid fly-ways, especially for raptors;
o Avoid development of priority areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, regional conservation plans, recovery plan needs for threatened and endangered species, and Audubon IBAs;
o Avoid impacts to species of plants and animals listed under the state administrative code and the ESA;
o Avoid local, state, or federally protected lands;
o Minimize growth-inducing impacts;
o Be consistent with the conservation priorities of existing land management and conservation plans;
o Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities;
o Minimize cumulative impacts due to existing and planned development in the region;
o Actively restore native vegetation to the project footprints after the infrastructure has been constructed.

4 http://ndow.org/wild/conservation/sg/resources/nevada_energy_standards_for_sage-grouse_2010.pdf

It simply does not serve the public need to make most of the state off-limits to cater to the welfare of one species of animal, or so that one type of vegetation that existed 100 years ago will be preserved. What lived 100 years ago is what survived the environment that existed at that time, and that environment has been changing since the beginning of time. What should be considered is the existing environment, with existing wildlife and human use factored in, not looking back to the past to create something that only prospered under those special conditions.

ENERGY (Wind, Solar, Geothermal)
2. ISSUE: The designated utility corridor along Heybourne Road that would carry the Blackhawk to Heybourne power line cuts through subdivisions that weren't on the books when the corridor was designed in the old RMP
Although the Blackhawk to Heybourne power line has been put on hold at the request of NV Energy, the utility corridor that would house this power line and others still exists. When the corridor was designated, none of the subdivisions it passes through were built - most weren't on the books. These now exist. Whenever a line is constructed as it eventually will be in the corridor, it will lower property values. Existing small power lines in this corridor have caused prime building lots in Saratoga Springs to remain unsold- even during the development boom years of the early 2000's. Retaining this utility corridor which will allow construction of a line like the Blackhawk will create an OHV circuit through residential areas that doesn't currently exist, will impact a federally listed species habitat and may create health hazards.

Table C-10
Special Status Wildlife

We encourage the CCD to adopt and incorporate effective bighorn sheep and domestic sheep and goat separation strategies (e.g. WAFWA 2010) into the RMP. In addition to adopting effective separation strategies, we request the CCD to analyze at risk bighorn sheep herds and ensure effective separation is provided. Based on information currently available to us, we have identified the Stillwater Range, Wassuk Range, Monte Cristo Range, and Desatoya Mountains as potentially having separation issues. To address this risk, we recommend conducting a grazing inventory to validate if a risk exists. Specifically, we recommend identifying and documenting specific areas within the at risk allotments that are currently grazed by domestic sheep (includes trailing routes). Followed by this inventory, BLM and NDOW can determine if a separation risk actually exists. If separation is confirmed to be inadequate, then we will work cooperatively with the BLM and livestock operator on addressing these risks using the most appropriate tools (i.e. SOP's, BMP's, etc.). For example, one of the greatest risks is leaving domestic sheep on the range. To address this risk, we encourage better livestock operation documentation and accountability. Additionally, we encourage better communication between NDOW, BLM, and the livestock operator so that such risk can be minimized. We look forward to working with the CCD and livestock operators on addressing these issues. It should be understood that we are not asking for any reduction in domestic sheep use; rather, we support appropriate management action to reduce the threat of potential disease transmission.
Research done at the Starkey Experimental Forest and Range is the most recent and most detailed and complex research done on deer and elk in relation to human travel modes consisting of ATV/trail bike, bicycle, hiking, and horseback. Previous studies dating back to the 1970s indicate that these animals flee from all of these travel modes. Starkey research quantifies the different rates, times, and distances. However, they admit that the resultant impact on individuals has not been determined and no scientific conclusions are reached in the studies on how this disturbance affects individual health or survivability. Likewise, no relationship has been made between the four disturbance modes and herd health. All that is known is that deer and elk run from humans using any form of travel. Nothing in the Starkey research proves the existence of motorized trails actually results in a decrease in habitat effectiveness or in an individual animal's poor health and survivability, nor is this evidence that current vehicle use is negatively impacting herd health factors. It should not be assumed that the elimination of motorized use would drastically reduce disturbance of wildlife or improve "wildlife vulnerability" when walking persons, persons on horses, mountain bike use, bird watching, hunting and numerous other uses that are documented to disturb, harass or kill wildlife are still allowed. Impacts to wildlife must be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle use must be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the Preliminary Proposals can be determined.
Western Watersheds Project would like to propose that the Black Mountain, Gray Hills, and Butler Mountain allotments be closed to sheep grazing without any conversion to cattle or other livestock use due to concerns about domestic sheep/bighorn sheep interactions and the disease risk this poses. Instruction memorandum 98-140 and WAFWA recommend a 9-mile separation between bighorn and domestic sheep and IM-98-140 actually mandates this separation for desert bighorn sheep. These 3 allotments are well within the 9-mile buffer area and portions of the allotments are within occupied bighorn sheep habitat. Sheep grazing needs to be expeditiously phased out on these allotments.
e. Threaten and Endangered/Sensitive Species. Evaluate the impacts of horses and burros on other species. Adjust number to reduce this impact. Some possible areas of concern would include the Wasuk HMA and sage grouse late brooding habitat in the Mount Grant PMU. Other conflict might include spring snail habitat and horse impacts to spring sources.

ISSUE 7: FISH AND WILDLIFE

Table C-11
Fish and Wildlife

Wildlife- Aquatic
Fisheries Management NDOW requests that the RMP allow for the introduction, reintroduction, augmentation, stocking or transplant of native and nonnative fish species. Additionally we request that other fisheries management activities such as stream and fish surveys (e.g. electro shocking,fish counter installation, etc.), rotenone and other registered piscicide treatments, etc. be allowed in the RMP. Rotenone and other registered piscicide treatments may be necessary to prepare waters for reestablishment of indigenous fish species, to protect or recover federally listed threatened or endangered species, to enhance sport fisheries, to remove undesirable non-native species or to correct undesirable conditions resulting from human-caused influence.
Wildlife- Birds
NDOW request that the RMP allow for the introduction, reintroduction, augmentation, exportation, pioneering, or transplant of endemic native and non-native wildlife. Specifically, we request that mountain quail, ruffed, and blue grouse be allowed on the CCD within areas of potential habitat. Additionally we request that elk pioneering be allowed. Furthermore, we request other game management activities such as surveys (e.g. aerial and terrestrial), water development, etc. be allowed in the RMP.
We strongly disfavor the development of wind power facilities, or associated infrastructure, roads or transmission lines, in areas that will destroy, degrade or fragment important wildlife habitats. Roads and other linear disturbances present a particular challenge to wildlife in the form of habitat fragmentation. Continued habitat fragmentation forces wildlife to live on ever-shrinking islands of habitat, where it is more difficult for them to find food, water, shelter, mates, and protection from predators. Genetic problems such as inbreeding appear, and populations become more susceptible to catastrophic events such as wildfire. The resulting fragmented habitat inevitably leads to smaller populations of wildlife, and extirpation of populations or complete extinction of species becomes more likely. Renewable energy projects should be sited to utilize existing rights-of-way.
Wind energy development impacts to birds, bats and other wildlife are well documented and could be severe if wind power development proceeds in the absence of careful planning to minimize collision impacts and habitat disturbance. Habitat impacts have received less publicity than collision impacts, although they could be as or more significant, particularly for imperiled species whose habitat is in prime wind energy production areas. Wind power facilities can directly impact habitats, via the footprint of turbines, roads, transmission infrastructure, and other support facilities.

Table C-11
Fish and Wildlife

- Areas Identified as "Important Bird Areas" ("IBA")

Important Bird Areas, or IBAs, are sites that have been identified under the auspicious of the Audubon Society that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. IBAs may be a few acres or thousands of acres, but usually they are discrete sites that stand out from the surrounding landscape.

To qualify as an Important Bird Area, sites must satisfy at least one of the following criteria. The site must support:
o Species of conservation concern (e.g. threatened and endangered species)
o Restricted-ranges species (species vulnerable because they are not widely distributed)
o Species that are vulnerable because their populations are concentrated in one general habitat type or biome
o Species, or groups of similar species (such as waterfowl or shorebirds), that are vulnerable because they occur at high densities due to their congregatory behavior

Identification of a site as an IBA indicates its unique importance for birds. The IBA identification process provides a data-driven means for cataloging the most important sites for birds throughout the country and the world. The use of a hierarchical classification system further helps to establish priorities for conservation efforts.3

On the CCDS there are at least five IBAs that have been identified and recognized as important at the state level:
o Lahontan Valley Wetlands IBA
o Carson River Delta IBA
o Swan Lake IBA
o Walker Lake IBA
o Mount Grant IBA

For a detailed description of the sites, their valued and unique features and the factors threatening them, refer to the Audubon website at: http://iba.audubon.org/iba/siteSearch.do .
Many land uses may be compatible with recognition of an ACEC designed to protect the vulnerable features of a particular IBA, and the primary focus should be on maintaining the integrity and function of the area.

All ACECs should have surface occupancy and mineral rights withdrawn, and federal water rights protected to ensure their integrity and site characteristics.

3 For further information, see: http://web4.audubon.org/bird/iba/iba_intro.html

Table C-11
Fish and Wildlife

Wildlife - General
Seasons of Use No grazing will be allowed in sage-grouse habitat during lek and nesting periods. This period is March 1 through June 20 or later. This must be applied to all sagebrush habitats, and to protect nesting migratory birds as well, and pygmy rabbits with young in shallow natal burrows. These habitats must be fully identified as part of the current process. Every effort must be made to avoid grazing areas critical for brood rearing, as well. No grazing will be allowed in sage-grouse habitat during winter periods. This must be applied to all sagebrush habitats. These habitats must be fully identified as part of the current process. This protects birds from disturbance and displacement by livestock management activities. In all instances of avoidance, livestock use must not be shifted and intensified into other fragile sites or vegetation communities, or other rare species impacted.
We strongly disfavor the development of wind power facilities, or associated infrastructure, roads or transmission lines, in areas that will destroy, degrade or fragment important wildlife habitats. Roads and other linear disturbances present a particular challenge to wildlife in the form of habitat fragmentation. Continued habitat fragmentation forces wildlife to live on ever-shrinking islands of habitat, where it is more difficult for them to find food, water, shelter, mates, and protection from predators. Genetic problems such as inbreeding appear, and populations become more susceptible to catastrophic events such as wildfire. The resulting fragmented habitat inevitably leads to smaller populations of wildlife, and extirpation of populations or complete extinction of species becomes more likely. Renewable energy projects should be sited to utilize existing rights-of-way.
Wild Horses v. Wildlife As for wild horses' supposed competition with wildlife, the species thought to seek out similar forage is elk. However, cattle grazing and disturbance regimes (such as fire) are the more likely suspects. In a study by Hansen, Clark, and Lawhorne (1977), the overlap among range users was found to be: 1% -- deer and wild horses 4% -- deer and cattle 77% -- cattle and wild horses Thus, cattle are four times more likely to affect deer than are horses. Here is the link. Note: You have to scroll down a bit to get to the study: http://www.jstor.org/discover/10.2307/3897750?uid=2129&uid=2&uid=70&uid=4&sid=47698843269457
RECREATION / OHV (Hunting, Fishing, Hiking, Biking etc) 6. ISSUE: OHV track / trail mileage has increased exponentially, creating a web of trails, tracks and roads There has been an exponential increase in miles of OHV tracks / trails. In the lower west Pine Nut range, OHV tracks can be found on and in nearly every ridge and drainage, and on many hills. Many hills have parallel OHV trails on them, located just a few yards apart. The Sunrise Pass road now has a deep OHV trail paralleling it that didn't exist just a couple of years ago. Each OHV rider wants to ride in virgin country, blazing their own trail. The definition of "access" for many OHV users means cutting a new trail every time they're out. Every spring site in the Pine Nuts has at least an OHV trail to it which allows disturbance for deer fawn rearing and sage grouse brooding. Trails fragment many types of wildlife habitat which affects species diversity and help spread noxious weeds. Trails allow soil erosion to occur which eventually turn the trails into deep cuts that are impassible -creating a reason to make new OHV trails. During a recent attempt at an inventory of tracks / trails / roads in one area of the CCDO, the increase was so rapid, the inventory couldn't keep pace. It's

Table C-11
Fish and Wildlife

nearly impossible to write effective regulations limiting OHV use to existing trails because new ones are created every day and are "existing" by nightfall. The problem has become especially bad since the USFS in California and part of Nevada closed its road system to OHV use except where posted open. The CCDO with specific areas like the Pine Nut Range is receiving unprecedented use from riders blocked from USFS lands
We urge that the Carson City District prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PZP fertility control (if necessary) and the protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues. Cooperative agreements with local horse rescue and wild horse organizations should be included as a means to negate urbaninterface issues facing animals near human development areas.
BLM Question: What methods, other than removal through gathers, should be considered to achieve AMLs? Please see above for additional information regarding the use of non-hormonal, reversible fertility control, such as PZP, and the strong argument against the permanent sterilization of wild horses and burros or sex ratio skewing. The RMP should accommodate, either permanently or temporarily, wild horse and/or burro population numbers over AML through conversion of livestock grazing AUMs to wild horses and burros while simultaneously utilizing reversible, nonhormonal fertility control to suppress population growth. In addition, water/bait trapping should be used as an alternative to helicopter roundups whenever possible-- especially in areas where water or forage are limited. Lastly, predator and predator prey protection should be supported by the BLM given its mandate to manage for a "thriving natural ecological balance" which cannot be achieved without predators.

Table C-11
Fish and Wildlife

The AWHPC urges BLM to incorporate a preferred alternative with the following components:

• Enhance range conditions, including the restoration and improvement of water sources for wild horses and other wildlife species, the elimination of fencing which prohibits wild horses and burros from fully utilizing the HMAs/HAs, etc. Range rotation, re-seeding temporary fencing, restoration/enhancement of water resources, and reduction of livestock grazing must be among the tools used to protect and restore any areas that do not meet habitat or rangeland standards.

• Re-introduce wild horses to the zeroed-out Herd Areas including Tule Ridge/Mahogany Flat, Pah Rah Mountains, Horse Springs, southern portion of the Pine Nut Mountains Herd Areas (HAs) where livestock grazing continues to be permitted. Private ranchers should not profit and benefit from their unwillingness to allow wild horses to remain in these HAs - therefore all livestock grazing should cease if wild horses are not permitted in these areas.

The District's claim that due to the private-public checkerboard ownership issues, the agency eliminated all wild horses from these areas is not sufficient. The BLM has the authority to temporarily or permanently eliminate or reduce livestock grazing to provide habitat for wild horses and/or burros. Therefore, the BLM must either work with the permittees (in the Pah Rah Mountains HA that includes the Spanish Springs/Mustang (03052), Olinghouse (03041) and White Hills (03058) allotments; in the Horse Springs HA that include the Horse Springs (03032) and Stockton Flat (03053) allotments) to either tolerate wild horses on their private lands or eliminate the privilege of grazing on adjacent public lands. This also applies to the permittees with allotments in the southern, zeroed-out portion of the Pine Nut Mountains HA which include the Buckeye (03509), Pine Nut (03576) and Churchill Canyon (03518) allotments.

• Protect predators and predator prey (i.e. mule deer, etc.) in an effort to restore natural population control mechanisms where possible and thereby restore a truly 'thriving natural ecological balance." It is essential to protect predator-prey populations in order to support predators in an area.

• Utilize a non-hormonal, reversible fertility control, such as PZP, where necessary, to control wild horse reproduction and avoid mass removals of wild horses from the range.

• Forbid the implementation of any permanent sterilization of horses and/or burros as a means to manage or control population growth.

Executive Order 13443, "Facilitation of Hunting Heritage and Wildlife Conservation", issued in 2006, directed the Department of the Interior and its component agencies, bureaus and offices "to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat." The Order called for a comprehensive 10-year Recreational Hunting and Wildlife Conservation Plan that would set forth an agenda for implementing the actions called for in the Order. The ten-year action plan was issued in December, 2008. Among its recommendations that address recreational shooting: "...incorporate hunting and recreational shooting into federal agency's planning processes; Revise BLM/USDA Forest Service management plans to designate shooting areas; Incorporate opportunities for hunting and recreational shooting into public land management, planning, and decision-making.

The wildlife in this district is abundant--pronghorn, sage grouse, birds of prey, lizards, snakes, and other small creatures and needs special attention. Unfortunately, the areas closest to Reno have been overrun by unwise ORV use and used as garbage dumps by those who do not care about the land. This needs to be addressed immediately. On more than one occasion, I have been walking with my dog in the Virginia Range and have had shooters fire very close to me. Since we have a shooting range provided at the base of the range, there is no excuse for this behavior and it needs to be stopped.

Table C-11
Fish and Wildlife

As for bighorn sheep and wild horses, competition between the species has not been supported by a number of recent studies. For instance, Wockner, Singer, and Schoenecker (2004) reported that...
" ... Our data suggested no obvious negative effect of horse grazing or the presence of wild horses on bighorn sheep. Bighorn sheep demographic patterns did not differ between the wild horse-bighorn sheep and bighorn-only areas. We found no differences in pregnancy rates, lambing rates, or lamb survivorship in bighorn sheep inhabiting areas on versus off the wild horse range (pregnancy rate of ewes (± s.e.) was 77 ± 4%, and lambing rate was 68 ± 5%, overall), although our sample sizes were small. This finding is in general agreement with those of Kissell and others (1996) and Coughenour (2000), who found little overlap in use of resources. Kissell and others (1996) and Coughenour (2000) found considerable spatial and habitat separation. Even where habitats were shared, diets tended to be largely different between the two species."

The researchers found spatial and habitat separation between bighorn and horses during all seasons.
Http://www.fort.usgs.gov/Products/Publications/21300/21300.pdf

CCDO's HMAs should become primarily horse or burro management area. Mustangs should be given priority for forage, with livestock interests subordinated to wild horse needs. Wildlife are said to be increasing to the point of being rounded up themselves by the State of Nevada. Obviously they have no problem sharing the range with wild horses. Livestock are a problem for wildlife, however, and should be phased out steadily over the life of the RMP Revision.

· Decreases Biodiversity (Fleischner, 1994) (Wilcove, Rothstein, Dubow, Phillips, Losos, 1998) (Belsky, Matzke, Uselman, 1999) (Wuerthner, Matteson, 2002)
· Elimination of Native Predators (Donahue, 1999) (Wuerthner, Matteson, 2002) (GAO, 2005)
· Introduction of Invasive Plants and Diseases (Mackie 1978, Longhurst et al. 1983, Menke, Bradford 1992, as cited in Fleischner, 1994) (Wilcove, Rothstein, Dubow, Phillips, Losos, 1998) (Donahue, 1999)

6. Transportation Planning and Off-road Vehicle Recreation

Travel planning requires the agency to manage human travel across the landscape. The land use planning process, which addresses the broader landscape within a planning area, provides one of the best opportunities to make travel planning decisions in the appropriate context. The placement and design of travel routes defines which areas will remain or become roadless, whether they will maintain or become of Wilderness character, and which areas will be disturbed and how. In other words, route decisions determine the fragmentation of the landscape, and, thus, how naturally or unnaturally a landscape will behave in terms of water flow and quality, wildlife migration, and species composition and function.

Table C-11
Fish and Wildlife

NEPA PROCESS
9. ISSUE: Private and foreign contract military personnel operate without NEPA or permitting.
I recently had a conversation with a packer who rented mules to a military entity for specialized troop training (mules are used in Afghanistan). The animals were being used in the south central portion of the CCDO. That area has already seen desert bighorn guzzlers used as ambush blinds in "military" games. Public users have been stopped by "military" personnel on public lands roads. Private, for-hire contract military personnel use CCDO to train private troops / security personnel. Private contract military personnel have been in CCDO to discuss use of public lands, but their activities were never analyzed, no stipulations / mitigation given and no permit for use issued.
The use of wildlife guzzlers is one example of potential impacts. Sportsmen's groups, the state and the BLM have spent thousands of dollars on bighorn guzzlers in order to try to maintain this native species. If bighorn are disallowed the ability to drink or are conditioned to avoid guzzlers or even shot at, an American resource is being damaged. If a mule pack train travels through a bighorn lambing ground or sage grouse lek, these activities could be impacted. The extent of this issue is unknown because the activity hasn't been analyzed. In New Mexico, the USFS has put Air Force PJ training under a special use permit that has worked for all concerned. If they can do it, certainly CCDO can do it for private military people who are simply public land users.

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2) Re-establishment of game (mule deer) in the Pine Nut Mountain range. I believe that in previous years most the mule deer population in the Pine Nuts was killed illegally by local shooters, Indians, squatters, and poachers. Postings for poaching, fines, and imprisonment would help along with more involvement from Fish and Game to increase the mule deer population. The 3 Basque sheepherder's (that I am aware of) that spend summer in the Pine Nuts and carry guns need to be educated per the rules of Fish and Game.

Water source development or augmentation should take place wherever wild horses and other wildlife occur; all will benefit from these improvements. Many EAs have anecdotal information outlining wild horses chasing other wildlife from a pond or stream, but these stories fail to indicate the deer that chase off the pronghorn, or the pronghorn that chase off the jackrabbit. Nearly every living thing in the desert will dominate a smaller entity - the horse being larger than the deer, the deer being larger than the pronghorn. It's a natural occurrence. If a spring or trough is developed, all will benefit. If water sources become scarce or unavailable, perhaps some thought should be given to supplemental watering. None of the animals on the range should be made to suffer for the conditions of the ranges they have chosen - or were forced - to live on.

An assumption that was often proffered by other stakeholders is that closing roads and trails to motorized uses would dramatically improve the effectiveness of wildlife habitat. In our opinion, much of the rationale expressed for restricting motorized vehicle use is tied to incomplete research and grossly excessive extrapolation of research data, and is often directly contradicted by the current condition on the ground today.

The agencies must not automatically assume that closing roads and trails to motorized use will instantly increase habitat effectiveness. The analysis must not improperly assume or over-estimate the beneficial affects to wildlife resulting from motorized route closures.

The BLM is an organization that fights against wildlife everywhere. Wolves, buffalos, bears, mustangs, coyotes, burros, they all are in the way of humans. Why the hell can humans not tolerate them and learn to share the habitats?

Prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PZP fertility control (if necessary) and protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues.

Table C-11
Fish and Wildlife

Predators

A major predator of wild horse foals is the mountain lion (Felis Concolor), the most widespread wild cat in the Western Hemisphere, found from Canada to the tip of Tierra del Fuego. It can be an effective, natural control on wild horse populations as demonstrated in the Montgomery Pass area and in the Pryor Mountains of Montana (until BLM Billings encouraged the killing of the cats). Other classic killers of wild horses are wolves and grizzlies. The former is only rarely present in HMAs.

We recommend that BLM work with the Nevada Department of Wildlife to decrease mountain lion hunting permits in wild horse HMAs. The Act mandates that BLM work in consort with other agencies to more effectively manage wild horse herds.

PS Mostly try to be as natural and normal as possible in regards to the wild horses and burros AND their natural predators. I believe we humans are way overthinking and doing badly in most cases involving wildlife and nature.

Wild Horse Data:
Documentation of Herd population count/census numbers which includes a complete demographic breakdown of Wild Horses in each of the Herd Management Areas

Number of Bands
Stallions/Mares ratios, which should be at a more natural ratio of 50/50
Foals
Yearling
3 Year Olds

Scientific data should be included and show the impacts of sex ratio skewing on the social/behavioral dynamics of the Wild Herds

Removal of fencing
These Wild Herds must be allowed to follow their natural grazing/migration patterns, to the degree possible. They also must be allowed to intermingle in order to maintain a viable and robust gene pool.

Predator protection
This is the natural way of population control, and these Public Lands/Herd Management Areas are, after all, wildlife areas, and should remain as such.

Prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PSP fertility control (if necessary) and protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues.

Table C-11
Fish and Wildlife

The Nevada WAP serves as a comprehensive, landscape level plan, identifying the species of greatest conservation need and the key habitats on which they depend, with the intent to prevent wildlife species from becoming threatened or endangered. The WAP contains a conservation strategy to provide guidance to successfully conserve Nevada's key habitats and priority species. This conservation strategy has been appropriately manage spring and riparian resources as these areas are especially important to wildlife.
We recommend water continue to flow to livestock water developments through the hot summer months even when livestock use of the water development isn't occurring. Wildlife becomes habituated and reliant upon water at development sites while being utilized in conjunction with livestock operations. These development sites can act as wildlife traps if water is discontinued when livestock use is no longer occurring. If water is discontinued during the hot summer months then wildlife dehydration is likely to occur that may result in wildlife mortalities.
We specifically request that any future renewable energy development within the CCD address the following concerns: o Be consistent with the direction and intent of the Nevada Energy and Infrastructure Development Standards to Conserve Greater-Sage Grouse Populations and Their Habitats4 o Minimize the projects' ecological footprints; site renewable projects on previously disturbed lands; o Avoid steep slopes in order to reduce erosion impacts; o Avoid sensitive and rare natural communities; o Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors; o Require structures that discourage perching by raptors; o Avoid fly-ways, especially for raptors; o Avoid development of priority areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, regional conservation plans, recovery plan needs for threatened and endangered species, and Audubon IBAs; o Avoid impacts to species of plants and animals listed under the state administrative code and the ESA; o Avoid local, state, or federally protected lands; o Minimize growth-inducing impacts; o Be consistent with the conservation priorities of existing land management and conservation plans; o Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities; o Minimize cumulative impacts due to existing and planned development in the region; o Actively restore native vegetation to the project footprints after the infrastructure has been constructed. 4 http://ndow.org/wild/conservation/sg/resources/nevada_energy_standards_for_sage-grouse_2010.pdf
Wildlife - Terrestrial
NDOW request that the RMP allow for the introduction, reintroduction, augmentation, exportation, pioneering, or transplant of endemic native and non-native wildlife. Specifically, we request that mountain quail, ruffed, and blue grouse be allowed on the CCD within areas of potential habitat. Additionally we request that elk pioneering be allowed. Furthermore, we request other game management activities such as surveys (e.g. aerial and terrestrial), water development, etc. be allowed in the RMP.

ISSUE 8: WILD HORSES AND BURROS

Table C-12
Wild Horses and Burros

No Mining, Drilling, Fracking or ROWs in HAs and HMAs

CCDO should close the HAs and HMAs to geothermal and fluid-mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration, and mining. Wild horses and burros should have peace in the areas designated for them to live. Rightso-f-Way should be avoided and routed around the HAs and HMAs.

PZP -- Stronger, Longer-lasting Effects than Originally Reported
Here is the link to a study comparing and contrasting the use of PZP ("SpayVac") and other methods of contraception of the horse. PZP's efficacy after just one injection was more powerful and longer-lasting than previously reported. Virtually 100-percent of mares were infertile in the first year and, after declining to 80-percent efficacy in the second year, there was no decline in the third year. PZP's rate of reversibility was recommended for further study. Here are the results:
100% efficacy in Year One
80% efficacy in Year Two
80% efficacy in Year Three.
Http://www.aphis.usda.gov/wildlife_damage/nwrc/publications/06pubs/miller062.pdf

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CCDO does not need to use PZP because most of its herds need to grow.

Suspend PZP until the Each Herd Reaches IUCN-Prescribed Size

In line with the aim of growing the herds to the right size, contraception should be discontinued. There should be an immediate suspension of PZP contraceptive treatments until ...
-Each mustang-herd population reaches at least 500 individuals of breeding status (with stud book and careful genetic management) and
Test results from Dr. Cothran establish that high genetic diversity has been achieved.

Only when these benchmarks are met should contraceptive measures be considered -- and then only if natural "green" population control measures on their own are not yet enough. Should disaster strike the subject herds, fertility needs to be quickly restorable. The best candidates -- mares and jennies with strong immune systems that keep them healthy -- could, ironically, be unavailable for herd restoration due to sterility caused by over-reaction to PZP or from repeated treatments. Unfortunately, PZP tends to select for immuno-compromised mares, who foal despite contraception because their weak systems under-react to it.

Table C-12
Wild Horses and Burros

No More Scarlet Letters
BLM's procedures call for mares that are treated with PZP to be freeze-marked with letters 3½-to-4 inches in size for identification purposes. The letters are typically placed at the top of the left hip, where they can be seen from above. The inescapable purpose of such huge markings is for convenience in spotting treated horses during a flyover. This disfigurement is unacceptable. Surely, no horses with such blemishes will ever be adopted. Their ruined appearance will also spoil the wilderness experience of ecotourists who come to see mustangs in their natural setting.

With regard to tracking and locating wild horses, BLM should employ inconspicuous electronic devices. The use of disfiguring freeze-marks must be prohibited. It should be noted that electronic tracking can also provide a record of each mustang's personal data for longitudinal studies. It is time for BLM to use modern methods instead of destroying the beauty of these animals.

Table C-12
Wild Horses and Burros

WinEquus -- Based on Assumptions

CCDO's field offices use a computer-based, herd-growth-estimation program for making predictions of wild horse or burro population trends: WinEquus. To arrive at these, BLM staffers perform simulation trials on estimated and extrapolated census figure "snapshots" using the subject software program. However, this software tool is only as good as the data plugged into it and the validity of the assumptions used. The current census method cause the input data to be over-stated, but the software is programmed to consider it under-stated. The results are further compromised by the limitations of the program's default settings, which are based on data from just one herd many years ago, when BLM's gather methods were different. The software also assumes continuously-declining PZP effectiveness rates that have not been supported by recent studies, cited herein -- PZP is not as reversible as previously believed -- its effectiveness declines to about 80 percent, where it remains, with only the 20-percent immunocompromised mares getting pregnant and producing immuno-compromised foals. For these reasons, the projections provide little more than Potemkin numbers -- proofiness without proof. Such projections do not pass muster and thus, do not justify BLM's decisions to severely reduce the herds' population or to contracept portions thereof. Instead, they serve as scare tactics to falsely portray the need for gathers and removals. BLM's methodology is faulty and must not be trusted.

Indeed, in 2010, an aerial census initially found only five more mustangs in the Clan Alpine herd than post-gather three years previously. Staff figured they must have missed some, so they added 200 to the total. Public outcry over this non-scientific approach led to a second survey, which found 21 fewer mustangs than the earlier count. The gather was canceled. The point is: Don't assume that population growth will occur at the same rate as in the past or even that it will occur at all. It may even drop. Especially if PZP-22 is involved.

It is further important to note that the population modeling software program incorporates the concepts of environmental and demographic stochasticity. The former holds that unpredictable variations in weather and other factors result in a statistical range of possible outcomes. The program accounts for these variables through use of random values. As stated above, those values were derived based on studies done many years ago and on just one herd. Demographic stochasticity recognizes that birth and death are random processes, even in a constant environment. The modeling program cautions that the results are not certainties. Yet BLM has acted as if they were solid proof.

If CCDO wishes to continue using WinEquus, then it must adhere to the program's instructions explicitly. Input data needs to be on known individual horses, as the program advises, not on a "snapshot" based on an out-of-date and unreliable aerial census, which is then extrapolated using unverified assumptions. BLM should require that WinEquus be updated with timely information obtained on each particular herd per field studies conducted at least every five years. The assumptions programmed into the default settings must reflect current management methods and the true effects of fertility control. The standard must be to base projections -- and management decisions -- on proof, not "proofiness."

Table C-12
Wild Horses and Burros

WinEquus -- Dependent on User Skill, Subject to Programming Errors

As stated above, WinEquus performs analyses per assumptions which, if flawed, lead to faulty forecasts. The program also depends on the skill of the user -- if inputs and instructions are off, so will be the projections. Further, the programming itself may have internal processing errors -- impossible results have been generated by WinEquus, such as predictions of huge herd levels at the end of 10 or 20 years, despite regularlyscheduled gathers to the lower bound of herd levels and regular PZP treatments. Further, it is important that whoever runs the models to be free of conflicts of interest. Moreover, they must have basic and refresher training in operating the program to hone
their skills.

Modeling Software -- Subject to Internal Programming Errors

It is especially important that WinEquus' results be re-tested for consistency. That means re-running the data to see if you obtain the same projections. Please understand -- WinEquus should not be singled out for criticism. All such programs have limitations. To illustrate this point, another modeling software program that BLM has used recently (in another RMP Revision) is called IMPLAN. Below is the link describing a recent discovery that IMPLAN had produced different results from the same data. The answer provided to the inquiry reflects the sensitivity of such systems and the possibility of software errors. The take-away: Modeling software programs are useful tools that depend on the accuracy of input assumptions and data, the user's strict adherence to established procedures, and the absence of internal programming errors. Imagine if the subject IMPLAN models had not been re-run -- the discrepancies might never have been caught. The danger of employing modeling software is that it cloaks planning with "proofiness" and "truthiness," leading staff, as well as the public, to believe that the projections are real and certain, when they may be anything but.

Http://implan.com/v4/index.php/V4/images/stories/videos/v3/index.php?
Option=com_kunena&func=view&catid=84&id=10197&Itemid=35

Impact on Livestock Grazing

The Act provides for wild-horse ranges to be managed principally for their benefit. BLM's attempt to define away this right by making distinctions among wild horse ranges, herd areas, and herd management areas is rejected as disingenuous. Obviously, BLM has been carrying out an inverted policy. BLM's Carson City District allocates two and a half times more resources to privately-owned livestock than wild horses. BLM appears blind to its favoritism toward permit-holders who, as it is, are getting cheap grazing slots and even on public lands that are supposed to be dedicated principally to wild horses. This state of affairs requires a 180-degree turn. It is time to rectify this inequitable distribution.

Therefore, CCDO should ...
-Buy out grazing permits in allotments that are within or that adjoin HAs, HMAs
-Buy "checkerboard" private lands that are inside and/or border HAs, HMAs
-Buy state-owned lands that are inside and/or border HAs, HMAs
-Negotiate land swaps with the state and private property owners.

Table C-12
Wild Horses and Burros

Livestock Production -- Business Sector Outlook 2010

The livestock industry sector has been in decline for some time now. According to the National Cattlemen's Beef Association's (NCBA) "Cattlemen to Cattlemen" program that aired on September 7, 2010 on RFD-TV, producers were not holding back their heifers to become part of their cow herds for future growth. The program noted that it takes three years to build a cow herd; so this trend was likely to be long-lasting. The principal reasons given for this decision were:
-Many operators are getting out of the business,
-Young people are not getting into the business, and
-General economic conditions were poor.

Water Sources -- Protect Them, Add Guzzlers, Forget Pipelines

CCDO needs to establish alternative water sources for the current principal consumers -- ivestock -- as well as for the wild horses, burros, and other wildlife. As landlord of the multiple-use range, BLM is responsible and accountable for providing water sources and maintaining them. However, installing miles of pipelines to bring water to the livestock constitutes inappropriate subsidization of the beef sector.

Instead, rain and snow catchment devices, commonly referred to as "guzzlers," should be strategically installed throughout the planning area, especially in the HMAs. Guzzlers capture, conserve, and release water, much like cisterns. Such systems are long-lived and require little maintenance, especially if constructed of cement. Their covers reduce evaporation -- a beneficial feature that provides an advantage over open reservoirs. Guzzlers also reduce the need to haul water into wilderness areas, should there be a\ severe drought.

Guzzlers come in all sizes and configurations. Those with a 10,000-gallon storage tank can support herds of big game animals -- and mustangs. Such large guzzlers can be buried underground, thus preserving wilderness vistas. Construction materials can be hauled into remote areas by helicopter, which will be a "constructive" use of the aircraft services contract. Below are the links to Web sites for more information on guzzler use by all sizes of animals. Guzzlers can even be used by humans. These Web sites also address guzzler design and construction, including a materials list and schematics.

Http://www.tpwd.state.tx.us/publications/pwdpubs/media/pwd_bk_w7000_0032.pdf
http://www.tpwmagazine.com/archive/2003/dec/legend/
http://wildlife.utah.gov/wr/0706guzzler/0706guzzler.pdf
http://muledeercountry.com/2009/09/mdf-water-guzzler/

Manage the herds first & foremost for genetic diversity for long-term survival in the wild (minimum 150 animals/herd or more).

Table C-12
Wild Horses and Burros

As for bighorn sheep and wild horses, competition between the species has not been supported by a number of recent studies. For instance, Wockner, Singer, and Schoenecker (2004) reported that ...
" ... our data suggested no obvious negative effect of horse grazing or the presence of wild horses on bighorn sheep. Bighorn sheep demographic patterns did not differ between the wild horse-bighorn sheep and bighorn-only areas. We found no differences in pregnancy rates, lambing rates, or lamb survivorship in bighorn sheep inhabiting areas on versus off the wild horse range (pregnancy rate of ewes (± s.e.) was 77 ± 4%, and lambing rate was 68 ± 5%, overall), although our sample sizes were small. This finding is in general agreement with those of Kissell and others (1996) and Coughenour (2000), who found little overlap in use of resources. Kissell and others (1996) and Coughenour (2000) found considerable spatial and habitat separation. Even where habitats were shared, diets tended to be largely different between the two species."

The researchers found spatial and habitat separation between bighorn and horses during all seasons.
http://www.fort.usgs.gov/Products/Publications/21300/21300.pdf

CCDO's HMAs should become primarily horse or burro management area. Mustangs should be given priority for forage, with livestock interests subordinated to wild horse needs. Wildlife are said to be increasing to the point of being rounded up themselves by the State of Nevada. Obviously they have no problem sharing the range with wild horses. Livestock are a problem for wildlife, however, and should be phased out steadily over the life of the RMP Revision.

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2. Below is the link to another study of PZP versus GonaCon in wild horses. Researchers note that mares in better body condition tend to produce more colts than fillies. BLM's sex-ratio skewing and mass innoculation of mares and jennies with PZP would lead to further imbalance.
Http://ddr.nal.usda.gov/bitstream/10113/45890/1/IND44438708.pdf

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Off-Road Vehicles -- Off-Limits in HAs and HMAs

Off-road vehicles should be prohibited in HAs and HMAs. ORVs are notorious for their damaging effects on range conditions, creating soil and vegetation disturbances and probably spreading weeds. They also disturb the peace and could be used to chase and harass the wild horses and burros.

Recreation and Wild Horse Viewing

As it is, most wildlife-tour visitors have to search long and hard to find any wild horses to view in the CCDO's HMAs. With the foals removed and virtually all the mares contracepted, there are few families, and especially, few precious "babies" frolicking on the range. Baby animals delight tourists. Adult horses, disfigured with huge freeze brands on their rumps, are not what the public is after.

CCDO's herds need reproductive capacity in order to have foals for the public's wildhorse- and-burro viewing pleasure. BLM must ensure that the herds are self-sustaining. By making the HMAs principally for mustangs and increasing their presence, recreation will be enhanced. Build the herds, and the visitors will come.

Table C-12
Wild Horses and Burros

Put an End to the Inhumane Helicopter-Stampede Roundup Method

BLM's use of helicopters to round up wild horses and burros is inhumane. Virtually all nationally recognized animal welfare organizations have so advised BLM. The mustangs are terrified by the thunderous, high-intensity noise and chaos as they are pursued by the low-flying helicopter. They are blasted with sand, dirt, and gravel from the rotor wash. Panicked, they stampede, injure themselves, and become separated from their babies and bandmates. Mares and jennies miscarry. Foals become orphans. Many mustangs die from stress, even more have to be euthanized. Helicopter-style roundups are abusive, especially to foals, older animals, and pregnant mares or jennies. Roundups during the heat of summer or the dead of winter are especially cruel. They are examples of worst management practices.

As has been documented on video, helicopter pilots conducting these roundups appear in a hurry to gather as many horses as quickly as possible, presumably to maximize profits -- they are paid a flat fee plus a per-horse amount. Frustrated by the wild horses' or burros' lack of cooperation, and impatient to get them moving faster, the pilots ram the animals with the aircraft landing skids, in some cases even flipping the creatures into a somersault. There is video documentation of such abuses, and a court recently found that they had indeed occurred. There has also been documentation of contractors whipping wild horses and burros in the face, kicking them in the head, dragging them by the neck with ropes, using electric prods on them. This abuse must stop.
CCDO should make whole-hearted commitment to the new approach -- bait and water trapping. The goal should be to replace helicopter roundups with this superior, kinder method.

Helicopter-style roundups must be abolished.
Roundups in extreme temperatures -- either the summer heat or the winter cold -- must end.
Stampeding horses for miles -- causing them to lather with sweat and then bringing them to an abrupt halt -- must be prohibited.

BLM should institute the kind approach to gathering wild horses -- when truly necessary, which they are not at this time. Roundups should be done slowly, quietly, and gently. They could even be contracted through equine advocacy groups with expertise in gentle methods. The mustangs should be gathered one band at a time to preserve family structure. Small roundups should be conducted every year in late autumn instead of massive rodeos every three-to-five years. Small-scale, annual fall roundups will mean fewer horses will come up for adoption, and they will be available just in time for the holidays. The horse adoption market won't be overwhelmed -- as it is now -- and fewer mustangs will need to be placed in sanctuaries, preserves, or long-term holding. Such an approach will prove cost-effective, enabling BLM to redirect its budget to rangeland
improvements.

Table C-12
Wild Horses and Burros

Cruelty-Free Methods -- No Helicopters, No Whips, No Electric Prods

I urge CCDO to renounce the use of helicopters, whips, and electric prods in gathering and maneuvering wild horses and burros. It is time to implement cruelty-free, whipfree, prod-free operations. Kind methods -- bait and water trapping -- should be the techniques employed in the future, should roundups be needed. These are true best management practices (BMPs).

If BLM's staffers do not feel qualified to conduct bait-trapping, there are trained units that could be brought in to do it or to show staff how it is done. For instance, the Modoc National Forest (California) reportedly has all necessary equipment on hand to conduct bait-trapping operations in a humane manner. Modoc seems like a good resource in this regard. BLM's Billings FO also eschews helicopters in favor of bait trapping. Learning something new is an opportunity for personal as well as professional growth.

The role of the Wild Horse and Burro Specialist will be enhanced by conducting gentle gathers and showcasing BLM's new approach. BLM's public relations will improve as goodwill builds from media coverage of the kind new method of conducting wild horse roundups. Further, job security will be strengthened if the Wild Horse and Burro Specialists become more hands-on. How can the need for the positions be justified when the only time they appear active is during a roundup every few years, with the actual work contracted to the private sector? One or two weeks' worth of mere coordination does not appear to support full-time positions. In this era of fiscal austerity, all staff members must be prepared to defend their continued employment.

To reiterate, the idea is for bait-trapping to replace helicopter roundups -- not for baittrapping to be just another method of gathering horses but the method. Further, it should not be a continuous, year-round endeavor, and it should not be used in combination with the helicopter method. Bait-trapping should, at most, be a once-ayear event, only when need is properly documented. No such need is projected for years to come because the CCDO herds appear largely under-populated.

Mass Removals Put Too Many Wild Horses on the Market at One Time

In its roundup-and-removal frenzy this past several years, BLM has already flooded the market with thousands of wild horses. The likelihood of so many mustangs being adopted is low because the market is overwhelmed. Further, with nearly 50,000 in captivity, the operational model clearly must be reformed.

As stated previously, gentle, small-scale annual roundups that preserve family bands need to replace mass roundups every four years. In addition, BLM should work with the various horse sanctuaries to find facilities to accept mustangs families that are not adopted. The goal should be to gather and place these horses with their families intact. Instead of euthanizing old and infirm horses, BLM should allow them to live out their lives in peace on their home range or else place them in sanctuaries, which maintain the mustangs' wild free-roaming behavior by keeping them in their natural social groups.

Table C-12
Wild Horses and Burros

Nothing to Hide

BLM typically restricts access to roundups by allowing a limited number of witnesses who must be escorted by BLM staff and are allowed in by reservation only. These preapproved observers are kept at a distance, often with their view blocked by strategically parked vehicles, and permitted to watch only on certain designated "Public Observation Days" or portions of such days. These restrictions suggest that BLM has something to hide. This sneakiness must end. The RMP Revision should stipulate that all gathers will be fully accessible to the public, with all operations conducted on public land and with transparency. Every roundup needs to be monitored at all times by independent animal welfare organizations to ensure no horses are harmed.

In the interim before gentle roundup methods are implemented, real-time video cameras should be mounted on roundup helicopters and kept running at all times to permit monitoring of the pilot's behavior toward the horses and the distances they are forced to run. Additional real-time video cameras should be set up to reveal what is going on inside the pens to monitor wrangler behavior toward the horses. The videos should livestream on BLM's Web site.

All short-term and long-term holding facilities must be open and available for unannounced inspections. Mustangs need to be tracked, and any member of the public should be able to follow an audit trail for each horse. The mustangs should not disappear down some black hole. The micro-chips recommended earlier in this letter should go far in helping to keep track of each mustang in the BLM database.

Visitor Protocol and Ground Rules

A recent EA issued by one of CCDO's field offices referenced BLM's rules of behavior, which roundup observers were warned they had to observe -- or else. These "rules" are condescending. Evidently being isolated in wilderness areas, BLM has forgotten how to behave toward constituents.

BLM needs to adopt a customer-service attitude. Training in this regard should be mandatory so that staff can learn how to deal with the public. Wild horse advocates should be treated as valued constituents. Partnership should be the goal. Happy customers will result if you treat people and animals with kindness. Be nice to the horses, and the public will be nice to you. The RMP Revision should address customerservice improvements and staff training in this regard.

Table C-12
Wild Horses and Burros

Long Transport to Holding is Cruel, Results in Illness

Most of the thousands of captured wild horses will be sent to long-term pastures, which brings up transit time. Prolonged time in trailer-travel is deleterious to horses' health. BLM's procedures call for mustangs that are in transit to be offloaded, rested, watered, and fed during journeys lasting more than 24 hours. However, the rest-stop provision may be waived (and probably usually is) if the "stress" of receiving a rest stop is deemed likely greater than the stress of uninterrupted travel. The procedures do not reveal who makes this determination or who monitors compliance. It is difficult to envision any scenario that would provide for an easy offloading of wild animals. Are there preidentified facilities along the way for this purpose? BLM does not say. Thus, the supposed provision for humane transport is probably theoretical. The mustangs suffer terribly since these trips to long-term holding most surely take longer than 24 hours on the road.

Coincidentally, on the "Tips for Traveling with Horses" episode of the "Best of America by Horseback" show that aired on RFD-TV on February 16, 2011, the guest veterinarian advised that horses should not be transported longer than 12 hours. He said studies have disclosed a higher incidence of fevers and respiratory infections when travel time exceeds 12 hours. Thus, there is no doubt that the wild horses, already stressed and crowded together in a cattle-car for more than twice that amount of time, will suffer illnesses as a direct result of the prolonged transport. This must be one reason why mustang deaths in long-term holding facilities exceed those that occur during gather, in short-term holding, and of course, on the range.

There is also a concern about the length of time horses may be kept in trailers while not in transit -- that they may not be left standing for a combined period of greater than three (3) hours. Crammed into a trailer, three hours is a long time.

The RMP Revision should explore placement of mustangs removed from the range but not adopted into nearby sanctuaries. The goal should be to keep families together and transit time short.

6.) Age structure and sex ratios. Manage wild horses/burros o have the majority of the horses in a HMA be non-reproducing. Consider in the smaller HMA of managing for one sex of horse, such as castrated males, or vaccinated females. It may be desirable in the future in the smaller HMA, such as Dogskin, if there are going to have to wild horses in the HA, then change the herd to old stallions to get to 0 reproduction. Some of the closer HMA's near Palomino Valley could be used to place older stallion that would not be adoptable. These horses could be castrated and turn out in different HMA's and they would be included in the total AML number.

When excess horses are removed from HA, they should first be young animals that are more adoptable age. Removal of horses four years and younger should be the first removed to get the numbers down to AML.

Table C-12
Wild Horses and Burros

Wild Horses v. Wildlife

As for wild horses' supposed competition with wildlife, the species thought to seek out similar forage is elk. However, cattle grazing and disturbance regimes (such as fire) are the more likely suspects.
In a study by Hansen, Clark, and Lawhorne (1977), the overlap among range users was found to be:
1% -- deer and wild horses
4% -- deer and cattle
77% -- cattle and wild horses

Thus, cattle are four times more likely to affect deer than are horses. Here is the link.
Note: You have to scroll down a bit to get to the study:
http://www.jstor.org/discover/10.2307/3897750?
Uid=2129&uid=2&uid=70&uid=4&sid=47698843269457

Genetic Health of Carson City District's Wild Horses and Burros
BLM needs to conduct a 100-percent evaluation of the genetic-diversity status of each of its mustang herds. Armed with those results and guidance from equine geneticist Dr. Gus Cothran, BLM must then develop management actions to increase (if necessary) and maintain gene-pool integrity. Such an evaluation is foundational to Best Management Practices. Removals should be suspended for any herd until complete information is obtained on each member, with an electronic micro-chip containing the each equid's personal-profile data implanted under the animal's skin. The information must be kept in a stud book -- a database -- for use in managing the herd for genetic viability.

How should BLM address wild horse and burro urban-interface issues?
These animals are very popular in areas of urban-interface, though highway fatalities can be a problem. Highway signs that warn of wild horses should show one or more running animals on them, not the single walking one most commonly seen. [In the case of Mound House non-barbed wire fencing should be provided that will keep them out of the industrial area and off of the highway (I know, not BLM)]. Wildlife underpasses or overpasses or designated crossings with sensory mechanisms that would set off flashing lights for large animals should be installed in areas of established hazard. Deer Run Road horses in Carson City are being managed appropriately except that birth control should be applied to females through bait, trap and release, allowing for foals to be born to the current producing mares perhaps every other year. Because this band has no interaction with other bands because of topography and the removal of another river band (Douglas County), and concerns about too much inbreeding, females born to this group should be birth-controlled until they are eventually removed for adoption. Interaction with another population of wild horses would be ideal. Work with local horse advocacy groups.

Which HMAs are suitable for the long-term management of wild horses and burros?
All HMA's.

What age structure and sex raos are appropriate to ensure healthy future herds of wild horses and burros?
Natural balance of male and females. If more males are included then some should receive vasectomies so that their behavior remains normal. All ages. Older horses should not be removed.

Table C-12
Wild Horses and Burros

When is it appropriate to develop or augment water for horses and burros? It is appropriate to augment water for wild equines when the lack of access relates to sources of water are cut off from them, via ranchers' fencing, mining expansion or a highway project - etc. Some emergency water in extreme drought. Know that wild horses may lose weight for various reasons, a temporary shortage of food is not a reason to remove them. If there is a conflict of water resources, drill a well.
Any other issues or concerns with the management of wild horses or burros? Better access to roundups, in the case of bait, trap and remove: should have public meetings and published results and actions. Humane observers allowed to observe bait and trap.
I am responding to BLM's request for input regarding the Resource Management Plan (RMP) Revision that is currently in its planning stage. My comments pertain principally to wild horses and burros. However, other topics necessarily must be addressed as well. Here are my recommendations for the principles on which Carson City District Office (CCDO) should approach management of its mustangs.
Consult with Wild Horse Advocates I encourage CCDO to cultivate partnerships with mustang advocates. I urge you to implement coordinated resource management (CRM) with your wild-horse-and-burro stakeholders -- cooperating, consulting, and coordinating with them, just as you do with your grazing permittees. The CRM approach will result in consensus-based decisions and the development of best management practices concerning wild horses and burros. This partnership needs to be achieved before preparing the draft RMP Revision.
End Improper Involvement of Livestock Interests in Wild Horse and Burro Matters It came to my attention recently, when reviewing an environmental assessment by one of CCDO's field offices, that a permit-holder was intimately -- and improperly -- involved in wild-horse management decisions. I caution CCDO that allowing a direct competitor of the mustangs to decide their fate is inappropriate and constitutes a clear conflict of interest. Having the representative of a grazier in such a capacity is comparable to having Bill Gates of Microsoft sitting on the board of directors of Apple Computers. I recommend that CCDO enforce an arms-length relationship between its staff and permitholder reps.
4. Lest replacing PZP with GonaCon seem like the answer, I refer you to the article linked below. Although the study concerns elk rather than horses, it cites research showing that a more potent dose of GonaCon appears to function as a sterilant -- the percentage of females still infertile actually increased over time. Thus, GonaCon can, just like PZP, lead to the slow extermination of a herd. Thus, it is not recommended. http://www.hcn.org/blogs/range/to-shoot-or-not-to-shoot-at-rocky-mountain-np? Utm_source=wcn1&utm_medium=email
Same Aircraft Census and Gather Contractor -- Apparent Conflict of Interest When the same aircraft-services contractor is involved in both the census and the roundup, there is an apparent conflict of interest. Such a contractor would appear motivated to find a population surplus so that there would then be a need for a roundup. The potential conflict pertains to the incentive to increase revenues by providing two billable services and finding more billable horses and burros. If you reform your census methods as described in the preceding section, you will separate census work from gather work. Clear delineation of these functions should eliminate the perceived conflict of interest.
3. Here is a link to an article on wild horse contraception in New Zealand, with a discussion of PZP versus GonaCon. It states that GonaCon is not a biohazard, as contrasted with PZP. Are CCDO staff aware that PZP is a biohazard? Are you taking precautions to protect yourself and the environment? Http://kaimanawa.homestead.com/news.html

Table C-12
Wild Horses and Burros

New Approach for Establishing Correct Herd Sizes
The concept of "appropriate management level" -- formerly referred to as the "AML" --has outlived its usefulness and needs to be reformed and renamed. To begin with, BLM now uses the acronym "AML" to stand for "abandoned mine lands." That is how it is used in various draft Resource Management Plan Revisions reviewed this year and last. So, a replacement term and acronym are called for. That's a good thing because the concept needed reform anyway. The low levels to which herds are being held are "appropriate" only in the sense of being administratively convenient for BLM. The limits placed on herd size are unscientific and insufficient for herds to be genetically selfsustaining.

To remedy both issues, it is herein proposed that herd sizes be determined per "proper population parameters" -- PPP or P^3 --"P-Three." Each P^3 would have a baseline -- a starting point -- of at least 500 or 2,500 horses. Where do these numbers -- 500 and 2,500 -- originate? They are the recommendations of the International Union for Conservation of Nature (IUCN), the world's oldest and largest global environmental organization. The IUCN is a neutral forum for practical solutions to conservation challenges and a leading authority on the preservation of genetic diversity in wild equids, including feral horses and burros.

The IUCN notes that the selective pressures wild equids have endured in the wild are likely shaping them genetically to be hardy stock that could prove useful as a genetic resource. The recommended population sizes for the conservation of genetic diversity fall into one of two approaches:
Captive populations -- minimum size: 500 individuals, a studbook, and careful genetic management; or
Wild populations -- minimum size 2,500 individuals (no studbook, no genetic management).

Table C-12
Wild Horses and Burros

I could find no indication that CCDO maintains a studbook of wild horses and burros under its jurisdiction or practices any true genetic management of them. I hope CCDO is ready and willing to comply with the requirements that would allow the herds to be maintained at only 500 individuals each and higher where already set at greater numbers. To do so, CCDO would need to:

-Perform a complete genetic evaluation of each herd as it stands now,
-Create and maintain a studbook for each herd, and
-Practice careful -- timely, accurate, responsible -- genetic management.

Lacking the above, then a herd size would need to grow to at least 2,500. Note that 2,500 is not a maximum but a minimum size. Higher numbers would be better.

To summarize, the P^3 for the wild horses of each HMA in CCDO's jurisdiction should be, according to the management model selected, at least either ...

500 with a stud book and careful genetic management -- or -- 2,500 wild horses without maintaining a stud book and careful genetic management.

By increasing the herd populations, the HMAs would be brought into compliance with upto- date scientific thought concerning adequate herd size. The proper population parameter -- the P^3 -- would be foundational to CCDO's new best management practices (BMPs) relative to protecting and preserving its wild horse herds. Below is the link:

http://data.iucn.org/dbtw-wpd/edocs/1992-043.pdf

Here are some numbers for you to compare and contrast. The HA and HMA data were extracted from BLM's 2011 figures. Those for the Serengeti Ecosystem have been provided for an interesting comparison, and are sourced from the IUCN report, which I would encourage you to study.

CCDO Planning Area Open to Livestock Grazing --
Size: 5,000,000 BLM acres (approximately), with many allotments inside HAs and HMAs
Cattle-Grazing Year-Round Equivalents: 13,579 cow+calf units
Acres per cow+calf: 368

CCDO Planning Area Open to Wild Horse and Burro Grazing --
Size: BLM acres: 1,998,807
Currently-Assigned Maximum Level: 3,505 wild horses in
Acres per horse: 570

CCDO Planning Area that Should Be Open to Wild Horse and Burro Grazing --
Size: BLM acres with reinstatement of 363,810 acres from HAs: 2,362,617
Increase of 2,915 to Currently-Assigned Maximum Level: 4,145
Acres per horse: 570

Table C-12
Wild Horses and Burros

CCDO Planning Area that Should Be Open to Wild Horse and Burro Grazing --
per acres per cow+cal f --
Size: BLM acres with reinstatement of 363,810 acres from HAs: 2,362,617
Increase of 640 to Currently-Assigned Maximum Level: 6,420
Acres per horse per cow+calf approach: 368

Note: I was unable to identify two small HAs. (Tule Ridge / Mahogany Flat?) One is southwest of Flanigan HMA, the other southeast of it and northeast of Dogskin Mountains HMA. These HAs should also be reinstated and repopulated with wild horses and/or burros.

Augusta Mountains -- Recommended for reinstatement of HA
Size: BLM acres: 176,208
Currently-Assigned Maximum Level: 308 wild horses
Acres per horse: 572
Size: BLM acres with reinstatement of 135,518 acres from HA: 311,726
Increase of 237 to Assigned Maximum Level: 545
Acres per horse: 572
P^3 Herd Size (with management): 500
Acres per horse: 352
Acres per horse with HA: 624
P^3 Herd Size (without management): 2,500
Acres per horse: 71
Acres per horse with HA: 125

Clan Alpine
Size: BLM acres: 298,064
Currently-Assigned Maximum Level: 979 wild horses
Acres per horse: 305
P^3 Herd Size (without management): 2,500
Acres per horse: 119

Desatoya
Size: BLM acres: 157,838
Currently-Assigned Maximum Level: 180 wild horses
Acres per horse: 877
P^3 Herd Size (with management): 500
Acres per horse: 316

Table C-12
Wild Horses and Burros

P³ Herd Size (without management): 2,500
Acres per horse: 63

Dogskin Mountains
Size: BLM acres: 6,497
Currently-Assigned Maximum Level: 15 wild horses
Acres per horse: 433
P³ Herd Size (with management): 500
Acres per horse: 13
P³ Herd Size (without management): 2,500
Acres per horse: 3

Flanigan
Size: BLM acres: 16,319
Currently-Assigned Maximum Level: 125 wild horses
Acres per horse: 131
P³ Herd Size (with management): 500
Acres per horse: 33
P³ Herd Size (without management): 2,500
Acres per horse: 7

Garfield Flat
Size: BLM acres: 125,420
Currently-Assigned Maximum Level: 125 wild horses
Acres per horse: 1,003
P³ Herd Size (with management): 500
Acres per horse: 251
P³ Herd Size (without management): 2,500
Acres per horse: 51

Granite Peak
Size: BLM acres: 3,981
Currently-Assigned Maximum Level: 18 wild horses
Acres per horse: 221
P³ Herd Size (with management): 500
Acres per horse: 8
P³ Herd Size (without management): 2,500

Table C-12
Wild Horses and Burros

Acres per horse: 2

Horse Mountain
Size: BLM acres: 49,572
Currently-Assigned Maximum Level: 95 wild horses
Acres per horse: 522
P^3 Herd Size (with management): 500
Acres per horse: 99
P^3 Herd Size (without management): 2,500
Acres per horse: 20

Horse Spring -- Recommended for reinstatement of HA
Size: BLM acres: 15,302
Currently-Assigned Maximum Level: 0 wild horses
Acres per horse: 0
Size: BLM acres with reinstatement of 15,302 acres from HA: 15,302
Increase of 42 to Assigned Maximum Level: 42
Acres per horse per cow+calf approach: 368
P^3 Herd Size (with management): 500
Acres per horse: 31
Acres per horse with HA: 31
P^3 Herd Size (without management): 2,500
Acres per horse: 6
Acres per horse with HA: 6

Lahontan
Size: BLM acres: 6,937
Currently-Assigned Maximum Level: 10 wild horses
Acres per horse: 694
P^3 Herd Size (with management): 500
Acres per horse: 14
P^3 Herd Size (without management): 2,500
Acres per horse: 3

Marietta Wild Burro Range
Size: BLM acres: 64,466

Table C-12
Wild Horses and Burros

Drastic Reductions in Herds Lead to Non-Viable Gene Pools

I would urge the CCDO to study the topic of "genetic drift." An excellent resource is linked below. Please note that stochastic events -- random, chance happenings -- can eliminate important survival-supporting, adaptive genes from a population. BLM's sudden, draconian removals and mass contraceptive application could randomly wipe out certain traits that are valuable and well-worth conserving. Please study the danger of creating a "population bottleneck," which is especially risky when a population is small, as is the case with all of the herds in question. Please also review the topic of the "founder effect" -- which occurs when a new colony is started by a few members of the original population. It too would apply to previous removals. Refreshing your understanding of these evolutionary impacts will surely make it clear that drastic levels of removals are contraindicated. Here is that link:

http://evolution.berkeley.edu/evosite/evo101/IIIDGeneticdrift.shtml

Gender-Ratio Skewing -- a Bad Idea
Drop the idea of gender skewing. Gender skewing is not natural. It causes behavioral disruption, which is incompatible with the principle of a thriving natural ecological balance. Moreover, given that any wild horses and burros that elude capture are likely to be males, the ratio will be further lopsided. A herd with too many stallions (or jacks) vying for a few mares (or jennies) is a recipe for chaos and injuries.

Outsiders -- Dealing with Roaming Equids
Removing horses or burros that have wandered outside the boundaries of an HMA -- "outsiders" -- just creates a vacuum for "insider" horses or burros to fill. Thus, removing "outsiders" is an ineffective population-control strategy. The elimination of mustangs from an open, accessible habitat results in repeated colonization by more mustangs. The process begins almost immediately, as horses or burros roam into the area and see that it is attractive and vacant. Thus, removal is not a true solution -- it just perpetuates the situation and leads to the elimination of more mustangs than necessary. Moreover, the outsiders may be only temporary visitors or refugees, not permanent residents.

Horses and burros will roam. It is management's duty to keep them from places they should not be. Prevention is key. Management should first encourage the outsiders to return to their proper place, then address those factors that caused the animals to leave home. Do fences need repair? Do gates need to be checked frequently and closed? Would palatable plantings draw the wild horses or burros to the areas BLM wants them to use? What about siting mineral licks inside the HMAs? Have guzzlers been installed to provide water sources within the boundaries? BLM-CCDO should specify preventive measures in this regard as part of its management approach. Return outsiders to the HMAs. Fence HMA perimeters -- after expanding them to include the herd areas previously taken away.

Table C-12
Wild Horses and Burros

Predator Protection
There can be no true "thriving natural ecological balance" without apex predators. Therefore, the CCDO should ensure the protection of native predators, including a prohibition on hunting them. Conservation measures will work to enable the right number of predators to establish themselves. Promoting and protecting such large carnivores can keep wild horse and burro herds in check. Such an approach would favor survival of the fittest, the best genetic adaptations, and keep the herds' population in equilibrium without human interference, just as the Act envisioned.

CCDO should concentrate on promoting and then protecting native predators to enable on-the-range, natural control of the wild horse and burro populations. A puma, bear, and wolf [reintroduction and] protection program would actually tend to strengthen the herds and would save costs. Concerned livestock operators should be encouraged to use guardian dogs to protect their animals. There are several specialty breeds that have been developed just for this purpose, and they are reportedly effective. BLM might even consider buying a number of trained guardian dogs, which could be placed, upon permittee request, with herds or flocks experiencing attacks.

PZP -- The Many Risks Involved

PZP carries certain risks that could devastate small, isolated herds such as those under the CCDO's jurisdiction. After the third consecutive inoculation, a mare is probably sterile for the rest of her life. Further, studies show that even after just one shot, 80- percent of mares remain infertile the third year later. Those that do foal in spite of PZP tend to be the immuno-compromised. Thus, PZP selects for horses with low immune response -- just the kind to succumb to any infection that comes their way. It is not unreasonable to be concerned that the subject herds may be inadvertently "managed" into near extinction. And no, just bringing in horses from other HMAs is not the solution. Besides, such animals will no doubt bring with them different "bugs" to which the local horses have no immunity. I provide the links below for information on PZP research.

1. The meta-analysis linked below was published in the journal "Reproduction." Studies of the side-effects of different wildlife contraceptives, including PZP, were reviewed. [Once on the site, page down to the sidebar on the right of your screen next to "Abstract" and click on "Results" and then on "Discussion."]
Among the findings with regard to PZP:
Males lose body condition [probably from all that battling over the repeatedly inseason mares] while the oft-claimed improvement in female body condition did not hold up.
Females experienced increased irritability, aggression, and masculine behavior.
The mares remained sexually active beyond the normal breeding season and had more "estrus events."
The possibility of "selecting for immuno-compromised individuals" is raised.
Finally, the analysis questions the supposed benefit of mares living much longer than their normal life expectancy.

Here is that URL:
http://www.reproduction-online.org/cgi/content/full/139/1/45

Manage the herds based on their behavioral/social structures, i.e., keep family bands intact as natural, functional units throughout all management activities. This maintains the critical educational system of each band (older band members pass down their long-time knowledge to younger animals).

Table C-12
Wild Horses and Burros

Use Independent Census-Takers and Scientific Methods for Counting Mustangs BLM needs an accurate method of taking inventory. The current aerial survey approach has proven unreliable. Inflated estimates of wild horse and burro populations have led to unnecessary removals, costly holding, and impaired relations with grazing permitholders (who are misled into believing there is a mustang population explosion) and mustang advocates (who have fact-checked the data and know the numbers being reported are wrong). I recommend that CCDO use independent census-takers and scientific methods for counting wild horses and burros. Abandon dependence on assumed birth rates and extrapolations to project population growth. BLM needs to employ a proven, technological method for counting and tracking horses and burros with accuracy. Further, BLM needs to compile and maintain a complete demographic breakdown of the mustangs in the HMAs. Genetic data must be kept in a stud-book database.
d. Herd Habitat Use. Is there seasonal movement of horses, such as from summer to winter use areas. Or do the horses spend 12 month of year in one location? If there is no movement, then range forage resources are receiving continuous use. Consider changes in HMA size, or adjust horse number to a level where season long grazing would have minimal impacts. HMA to look at would include Dogskin, Granite Peak, Garfield Flat.
7. In removing horses , bands should be held in tact removing only a few from the bands. Bands are important as the lead mare prevents premature pregnancy of the young mares which , if done, can be deleterious to the young mare as well as the foal. Foals should not be removed and allowed to breed once to have their genes be a part of the pool. To remove only foals is asking for an increasingly older generation of horses as round ups are every two years now. To remove only foals seems to negate adoptions as adopters want horses they can gentle and engage in training within a short period of time. They don't want horses they have to be unable to ride for three years because they were brought off the range as 0-6 month foals.
8. Bait trapping for the smaller herds is preferred but should not be permitees as there is a conflict of interest and a lack of supervision, transparency and accountability.
9. If the horrors of the helicopter contractors have been documented by CORS, employees of the BLM, and the public, imagine the potential horrors of the private bait trapping permitee contractor many of whom have no love for the horses.

Table C-12
Wild Horses and Burros

While the WH&B program is constrained by budget, adoption demand and public opinion, the CCDO should still strive to improve the management of wild horses on the land and most importantly, strive to manage the health of the land. Recommendation for improving the health of the rangeland while managing horses are:

1.) Should HMA boundaries be adjusted, combined or eliminated.

Recommendations:

a.) If there is no water within an existing HMA, and water exists outside the HMA, but is not controlled by the BLM it should be eliminated. This would include the Horse Mountain HMA and Lahontan HMA.

B.) If there is no water within an existing HMA, but horses' water outside the HMA on BLM land and the water is available, i.e. springs creeks, etc. then consider adjusting HMA boundaries.

C.) If there is very little water available in the HMA, and very little water outside the HMA, and the water is controlled by the permittee, i.e. wells, water hauls, and then the HMA should be eliminated. The Garfield Flat might be a candidate for elimination or wild horses. This HMA may be more suitable for burros.

c.) If the HMA is very small, is confined by fences and horses do not have seasonal movement, i.e. summer and winter use areas, the HMA should be eliminated. This would include the Doeskin HMA. While the HMA boundary does not encompass the entire Dogskin pasture, it is still a very small area to allow season long use by wild horses. Wild horses in this pasture have severely degraded all the water sources, springs and riparian areas in area. They have numerous trails on the steep granitic slopes of this mountain that are a major contributor to soil erosion. With the season long use by wild horses on perennial grass, much of the forage resources have been severely reduced overtime in this pasture. Also, if the boundary to the HMA was adjusted to the pasture and allotment fences, due to constant ORV use in this area, it is difficult to keep wild horses contained in the Dogskin pasture due to downed fences, open gates, etc. To a lesser degree the granite Peak HMA should be eliminated for similar reasons.

d.) HMA boundaries that do not follow fences or natural breaks should be re-examined. If it would facilitate management of horses by adjusting the boundary to a fence or natural break that restricts horse movement than that should be considered. HMA that should be adjusted would include Flanigan Adjust to the allotment boundary on the northeast, east, south and west side. Combine with Fort Sage HMA. South Stillwater also should be re-examined for a more suitable boundary. Any increasing in the HMA size should not be followed with an increase in horse numbers.

e.) If an HMA contains only one seasonal range or use area, but horses are migrating in and out of the HMA, then adjustment should be examined. An example is the Desatoya HMA in Churchill County. The boundary only takes in summer range, but does not include Edwards Creek Valley where the horses are in the winter. Adjust the HMA to follow the allotment boundary for the Edwards Creek allotment and the Cold Springs pasture of the Clan Alpine allotment. Combine with the Desatoya HMA in Lander County along the county line. The Wasuk HMA also should be examined as to what a reasonable boundary might be. Any increasing in the HMA size should not be followed with an increase in horse numbers.

Table C-12
Wild Horses and Burros

2.) Criteria used to make habitat and population suitability. Periodically review the AML for each HMA. While the AML were set in the 1990's for the most part using utilization pattern mapping and census numbers, and a formula for rationing available forage on an average year, this was a good place to start for setting number. But this is not ending point. CCDO needs to go beyond looking at carrying capacity and look now at limiting factors that exist on in the HMA's. A proposal Jack Alexander, Synergy Resource Solutions, Inc. and I developed several years ago recommended a possible score card approach, similar to a Rangeland Health Assessment (see attached Setting Appropriate Management Levels for Wild Horse Monument for the 21st Century- Moving Towards Responsible Management).
Criteria to evaluate and adjust wild horse numbers would include: a. Ecological Condition/Rangeland Trend/Rangeland Health. Rangeland that have a low similarity index, (degraded conditions) with downward trend may require a reduction in number to reverse a downward trend. The Dogskin HMA may be in the category of declining ecological condition and trend.
Return the WH&B Program to on-the-range management as opposed to off-therange management that has been going on for decades.
c. Soil Erosion. Are there areas of accelerated soil erosion that is caused by horse trailing, or located in watering and grazing areas. An example is some of the erosion that has been caused by horses in the Dogskin HMA around the springs on the south side of Dogskin Mountain.
4. Volunteer and community resources need to be identified and tapped into to deal with range health problems related to the horses and burros.
e. Threaten and Endangered/Sensitive Species. Evaluate the impacts of horses and burros on other species. Adjust number to reduce this impact. Some possible areas of concern would include the Wasuk HMA and sage grouse late brooding habitat in the Mount Grant PMU. Other conflict might include spring snail habitat and horse impacts to spring sources.
f.) Forage Species. Evaluate what the forage horses are consuming. If the desirable forage is in low quantity, then horses may consume undesirable/less palatable species. This would be an indicator of poor habitat conditions. This would also tie into body condition scores.
g.) Body Condition Score/ Health of the animals. If lactating mares are not holding a body condition of 5 or more (out of 10) yearlong, then the habitat/forage may not be adequate for the animals. Adjust horse number to the amount of suitable habitat and available forage. Consider replacing wild horses with wild burros if habitat is more suitable for burros. This could include the Garfield Flat HMA.
h.) Other conflicts. Consider reduction or removal of horses in areas where there are conflicts with urban development, residential areas, highways etc. Possible conflicts include the Pinenut HMA where horses cross the Carson River and get to HWY 50.
i.) Manageability of the HMA. Since horses and burros are not a native animal to the Great Basin, there impact on the environment can be very detrimental. Since the BLM is required to manage wild horses and burros on public land, it would be difficult to eliminate all of the HMA. But, if number of animals could be set very low, regardless to the size the HMA, then it would be a benefit to the environment, to the tax payer and the animals. The few wild horses or burros on the range would be healthy, there would be less impact to critical resources, i.e. springs, riparian areas. Cost of gathering would be low, there would be fewer excess horses to adopt and if budget constraints were such that scheduled gathers got postpone, then there would be more "slack" in the forage resources to handle more animals. As it stands now, postponement of gather a year of two can be extremely detrimental to the rangeland when numbers are over AML.

Table C-12
Wild Horses and Burros

3.) Methods to achieve AML: Since there is little to no market for adoptable animals and the cost of maintaining animals off the range is expensive , the BLM, and specifically the CCDO should strive to achieve zero population growth on all HMA's.
Continue to work with using contraceptive vaccines. Maintain AML with adult horses that have been castrated or vaccinated. Invest in capturing horses and burros every year to every two years to maintain a zero reproduction with the contraceptives. In the long run this may be a lower costs alternative for maintaining the HMAs. Continue helicopter to gather. Invest in the infrastructure for "passive" or "water/bait trapping" of horses and burros where this type of trapping would work. This may involve water trapping in some HMA's and food trapping in HMA adjacent to urban areas where horses are already used to people and being fed. Work with local interest groups, ranchers, permittees on authorizing them to construct, set-up, maintain and operate water/bait traps. Work with groups to "adopt a HMA" to assist the BLM in capture and adoption.
Remove young horses of adoptable age. In the smaller HMAs, work at making the majority of the population non-reproducing. As in the Dogskin HMA, if wild horses are to be maintained in that HMA, only have 13 head of castrated male or only have spayed mares. Consider mixing species in some HMA where there is suitable habitat for both horses and burros. Population growth would decrease over the long term with an increase in sterile hybrids (mules/hinneys). Work with NDOW on mountain lion hunting permits. If known mountain lions are preying on wild horses, recommend to NDOW to avoid hunting those animals.
4.) Urban-Interface. Continue to work and support any private groups that want to "adopt-a-herd". Provide these groups with tools and training to mitigate problems within urban interface, such as the Pine Nut HMA. Examples would include allowing groups to capture and remove problem animals, adopting animals, doing public out-reach and education.
Scoping Handout- 3.1 Recreation and Travel Managemeny and Soping Handout- 3.3 Recreation and Transportation Management FAQs I propose that all motorized vehicles be banned from off-road travel within any legal Herd Area (HA) land. I personally have even seen OHV hunters driving off-road within legally designated Wild Horse and Burro areas in search of something to shoot (guns visable). This is despicable in both the ethics of hunting and in the concept of range health. I supply you here with a photo of a recent OHV event on the Twin Peaks HMA as an example of OHV damage being done.
b. Riparian Areas. Are horses impacting riparian areas and important springs sources, are there conflicts with wildlife i.e. bighorn sheep. Location where horses are impacting riparian areas include the Dogskins, the high elevation of the Clan Alpine and Desatoya Mountains, Cottonwood Creek in the Flanigan HMA. Also included are the water sources in the Garfield Flat, Pilot-Table Mountain and Wasuk HMAs. Consider adjusted numbers to minimize the impacts. If growth of vegetation on riparian areas is below a set threshold, i.e. 4 inches stubble, use this to adjust AML. Reduction in horse numbers may not entirely reduce utilization in all riparian areas; it would be a good start.
The BLM manages wild horses and burros on 26 million acres of the 235 million acres that are in the BLM jurisdiction and 25 million number is a significant reduction from nearly 40 million acres for principle use of wild horses and burrows when the law was written in 1971. It is important that that acreage NOT be decreased any further by the Carson City RMP. If anything, HMA boundaries could be increased to accommodate wild horses for the 13 million acres that have been taken away from the by the BLM for the multiple use doctrine as well as other reasons.

Table C-12
Wild Horses and Burros

Utilize water/bait trapping by family band to apply PZP to mares (Nov-Feb); to remove one to two younger animals for adoption, if needed; & to return the lead stallions, lead mares & remaining younger & older family members to the range together. This will keep the knowledge pool hierarchy intact & will reduce compensatory & uncontrolled reproduction caused by traumatizing roundups, massive removals & random selective releases back to the range not based on family band structures-- all actions that render the bands/herds dysfunctional.
Allow natural selection to occur on the range except for the possible selective removals of one or two younger, adoptable animals per family band, if needed. Do not remove the lead stallions, lead mares or older family members.
Keep the sex ratio of each wild reproducing herd to the more natural 50:50 balance without the introduction of geldings which will upset the herd social structures/behaviors.
Utilize reserve design & natural predation for population control in as many herd areas as possible.
Repatriate STH & LTH horses back to their legal homelands (expand back to original HAs or equivalent acreage); combine geldings & mares 50:50 together in separate, isolated herds away from the other reproducing wild herds.
Develop & implement truly humane treatment standards & natural horsemanship techniques for all phases of on-the-range & off-the-range WH&B handling.
Form partnerships with volunteer advocacy groups & others to help manage the WH&B on the range, to water/bait trap, identify & catalog each band/animal, apply/track PZP treatment, census, check fencing & water access, monitor range & aquatic conditions, ensure herd connectivity & summer/winter migration patterns, reseed the land, develop water improvements, track all animals through the system via video monitoring & digital photos, etc.
Retain a few herds in the wild that have not been rendered dysfunctional from traumatizing roundups, massive removals, & random selective releases & whose populations have been controlled by natural predation. This way true, nonmanipulated, natural, functional, healthy herd behaviors & social structures can be scientifically observed, studied, recorded, analyzed & reported in professional publications. The Montgomery Pass Herd in CA/NV is one such herd.
Promote & market the iconic herds worldwide for tourism viewing & photographing to create jobs & boost local economies in the West.
6. Methods to maintain the AML should be the use of PZP at the right time (Dec. through Feb.) in the right number (65-85% of the mares in the herd). Heretofore, PZP has been used in a very sloppy, haphazard way. No wonder the results haven't been promising. As improvements in the PZP drug are made and the results of spavac come in, chemical birth control seems guardedly promising. Geldings to replace the number of mares on the range and dangerous ovariectomies should not be considered as you are putting undue stress on the reproductive herds compromising their viability,
Add WH&B as cultural resources in addition to their existing designation as natural resources. America's symbols of freedom, our Western heritage, on whose backs helped to create this country deserve more than a natural resource designation.
5. 7-8 of the Carson District HMAs, namely Garfield, Pine Nut, Pilot, Desatoya, Wassux, Flanigan, Clan Alpine, and Marietta have populations that are nearly viable and sustainable. No change except for a slight increase in lower AMLs to 100+ should be done. Geneticists such as the BLM's Gus Cochran will tell you about 150 horses make for a viable herd. (Congress is being asked to adjust the AML for the Corolla horses in the Carolinas to above 100 to maintain the viability of these horses as these horses are revered as the State's symbol).

Table C-12
Wild Horses and Burros

The law clearly states that wild horses and burros should be protected as viable herds. To that end, and to help herds in the remaining HMA's, it is appropriate to develop water sources as needed to keep the herds at AML.
Roundup and removals are the most problematic aspect of the wild horse program. Removals should be last resort and populations should be managed with PZP to keep reproduction rates down while maintaing healthy herds. Proper use of PZP can keep reproduction rates down as low as 10 percent, reducing the need for removal and long term storage of wild horses.
All HMA's are suitable for the long term management of wild horses and burros. While the BLM has removed herds and zeroed out dozens of HMA's, that is against the intent of the original law and needs to be rectified.
As for wild horse and burro urban interface issues, every effort must be made to keep the public from feeding wild horses, to place appropriate signs and lights to inform the public of wild horse crossing areas, and to build fences wherever possible to keep horses and humans out of harm's way.
Wild Horses and Burros Friends of Nevada Wilderness is committed to protecting Nevada's wilderness study areas and other lands with wilderness character. We are also concerned about the health of wild horses, wildlife and their habitats. When horse numbers increase above levels the land can support, wilderness values can suffer as can overall health of our public lands. When horse numbers reach unsustainable levels, we are not only concerned about damage to the sagebrush community and competition with native wildlife such as sage-grouse, but we are also very much concerned about the current and future health of the horses themselves. Because wild horses in Nevada have no natural predators, we understand that active management can be necessary to maintain the herds at humanely sustainable levels, without destroying the land that sustains them. We support the RMP making decisions that will keep both our wild horses healthy and our public lands and wildlife healthy.
The interest in preserving the wild horses and burros on the range appears to be for their cultural and historical value, unlike the immediate pleasure interests of wildlife people and the monied interests of cattle owners and mining and energy extractors. The wild horses and burros have been given a defined place 27M acres compared to 650 M acres of BLM land in which they must function. With that in mind, the RMP needs to deal with their needs in that confined area.
1. The roaming patterns of the wild horses and burros in the 12 Carson District HMAs need to be researched and documented showing where they are in winter, spring, summer and fall. The HMA boundaries need to be adjusted to accommodate these roaming patterns. Fences (barriers) need to be addressed so as not to obstruct the roaming patterns as well as to safegfuard them.
2. The forage/water sources need to be researched and documented and where problematic, addressed such as: a. Are the problems because of negligence or lack heretofore to research, document and resolve the problems, or b. Are the problems because of multiple use, competing interests, wherein negotiations need to be mandatory and common solutions need to be accomplished to meet the need of all the stakeholders.

Table C-12
Wild Horses and Burros

3. Do government monies need to be shifted from off the range to on the range management in the Wild Horse and Burro Program? With 75% of the $77 M going to off the range programs , 19% to program support, and only 5% to on the range programs, it appears this component of government is mismanaged and reallocation of monies to on the range programs need to done. The 1971 Law mandated the horses and burros be managed and protected on the range providing for healthy horses on healthy rangelands.

Should HMA boundaries be adjusted, combined and/or eliminated?
HMA boundaries could be adjusted with no loss of land mass to eliminate the worst of the checker boarding. HMA boundaries should not be eliminated. The Lahontan area HMA boundaries should be adjusted to allow horses access to water and natural shade.

Refer to the successful model management programs already in place for the Assateague & Chincoteague wild horses on the East Coast & ISPMB's WH&B Conservation Plan.

In addition the EIS must evaluate current commercial uses within zeroed out HAs- and must not dismiss re-evaluating the reintroduction of wild horses and burros into these HAs by claiming that reinstating zeroed-out HAs was "considered but not carried forward" because the conditions that prompted their closure have not changed; this type of dismissive response is not sufficient and not indicative that the agency took a hard look at the data. The RMP and EIS must analyze and explain why each zeroed-out HA is not a candidate to be reincorporated as a HMA.

Predators

A major predator of wild horse foals is the mountain lion (Felis Concolor), the most widespread wild cat in the Western Hemisphere, found from Canada to the tip of Tierra del Fuego. It can be an effective, natural control on wild horse populations as demonstrated in the Montgomery Pass area and in the Pryor Mountains of Montana (until BLM Billings encouraged the killing of the cats). Other classic killers of wild horses are wolves and grizzlies. The former is only rarely present in HMAs.

We recommend that BLM work with the Nevada Department of Wildlife to decrease mountain lion hunting permits in wild horse HMAs. The Act mandates that BLM work in consort with other agencies to more effectively manage wild horse herds.

Livestock Reduction/Energy Development

Competition for water between wild horses and livestock on public lands in the Carson City District is a real and escalating problem. On legally designated wild horse ranges, which constitute such a small percentage of all public lands and a small percentage of public lands in comparison with privately owned cattle, the wild horse and burro should receive its fair share of not only forage, but water. As the principle user on these relatively few areas, the Act mandates fairness. We recommend that any reductions in use should occur among the ranks of the private livestock on public lands not wild horses.

In years like this one, when Carson District public lands have received less than normal moisture, cattle and sheep should be removed, so that the legally designated, principle grazers remain-namely wild horses and burros. The kneejerk reaction made to remove wild horses in northern Nevada without considering other alternatives is shortsighted and unnecessary. The majority of these animals will be warehoused. Now more than ever, this should be a last resort option, not the unsustainable first choice.

Table C-12
Wild Horses and Burros

Sex Skewing

We recommend that under no circumstances should BLM artificially increase the number of males in relation to females on wild horses ranges.

Data indicates that more often than not, females slightly outnumber males on wild horse ranges. Regardless, in a misguided attempt to decrease reproduction, there has been a concentrated effort to reduce females and increase males-despite the lack of research on how this might impact wild horse family band structure and health.

A BLM Wild Horse and Burro Specialist mentioned to us that skewing the sex ratio in his herd areas resulted in massive injuries to stallions who fought viciously over the relatively few females. Any management action that disrupts a highly evolved society should not be undertaken without extensive field research.

Conclusion

Some BLM decision makers have little knowledge or appreciation of the way wild horse society operates. Unfortunately, these decision-makers may trump their own BLM Field people who often have extensive knowledge about wild horse behavior. Unintended consequences can arise from a lack of understanding of wild equid social organization. Management decisions can actually stimulate reproduction. Excessive disruption of the social order of wild horses due to roundups and removals can result in compensatory reproduction.

Wild horses organize themselves differently than any other hooved animals on the continent and some BLM officials with whom we have spoken have not a clue of these differences, nor a desire to learn what these differences entail. We recommend that BLM staff involved with wild horse management in the Carson City District watch and discuss the Cloud programs, which document the behavior of wild horse families on the Pryor Mountains from 1994 through 2008. We'd also be more than happy to discuss with you our observations regarding wild horse behavior, in person or over the phone.

Thanks so much for considering our recommendations. Please make we are on the mailing list for the rest of this RMP process and for any actions pertaining to wild horses and burros in your district.

The economic realities of a fiscally unsustainable program, which currently stockpiles approximately 50,000 wild horses in government holding facilities at a cost to taxpayers of nearly $50 million annually. Strong public sentiment against wild horse removals and in favor of maintaining wild horses on the range must be a determining factor in how the Carson City District manages the public lands under its jurisdiction.

The RMP should accommodate, either permanently or temporarily, wild horse and/or burro population numbers over AML through conversion of livestock grazing AUMs to wild horses and burros while simultaneously utilizing reversible, non-hormonal fertility control to suppress population growth. The establishment of AMLs for wild horses and burros should be based on sound science and actual range monitoring data which differentiates between the impacts of livestock and wild horse/burro grazing.

Table C-12
Wild Horses and Burros

The EA for the South Steens Wild Horse Gather [http://www.blm.gov/or/districts/burns/plans/files/SSteensGatherEAandFONSIFinal.pdf] (page 41) states, "Skewing the sex ratio of stallions v. mares would result in a destabilization of the band (stallion, mare and foal) structure moving it from five to six animals to three animals. Social band structure will be lost resulting in combative turmoil as surplus stallions attack a band stallion trying to capture his mare. This could result in the foal being either killed or lost. The mare and foal will not be allowed to feed or water naturally as the stallion tries to keep them away from the bachelor bands of stallions, resulting in stress to the mare during her lactation condition."
We urge the Carson City District Office to consider the interests of all Americans, not just local and commercial users of our public lands, when crafting the new RMP and all other land-use documents tiered to it. The new RMP must recommend options for increasing wild horse and burro appropriate management levels (AML), reinstating wild horses to zeroed-out herd areas (HA), ensuring that management does not negatively impact herds or violate federal laws, affording wild horses and burros an equitable distribution of resources within designated habitat areas (i.e. HAs).
The RMP is the planning document which allocates the resources and AML are based on forage and water resources. The BLM must include an alternative for increasing AMLs in HAs and HMAs. Increasing AML can be accomplished through the agency's Adaptive Management Strategy and by decreasing livestock grazing within the complex, pursuant to 43 C.F.R. 4710.5(a). BLM's adaptive management approach provides the discretion necessary to reevaluate AMLs. Social and legal, as well as biological, factors play a role in AML and excess determination.
What methods, other than removal through gathers, should be considered to achieve AMLs? Bait, trap, treat females with birth control, and release. Some young and older males could have vasectomies.
AWHPC urges that the RMP declare HMAs closed and off-limits to geothermal/fluid mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration and mining. Recreational vehicle activity should be minimized, as its damaging effect on range conditions has been widely documented. By eliminating or greatly reducing the commercial operations within herd areas and herd management areas- negative impacts, such as surface destruction and the large consumption of water, will be minimized allowing the agency to better protect and manage wildlife- including wild horses and burros.
With this in mind, where feasible, we recommend that bait and or water trapping replace helicopter stampedes. When a band is captured we recommend that all mares (females one year an older), be darted with the most long acting, but reversible, PZP drugs available. If true excess can be established, we recommend that only the young, adoptable animals be removed. It is terribly cruel and economically unwise to remove old animals that have lived all their lives in freedom. Many will not adapt to captivity and the change in diet. BLM's own employees in both Colorado and Nevada have stated this to us.
When revising its land use policies and establishing Appropriate Management Levels (AMLs) for wild horses and livestock grazing allotments, the BLM must consider social factors including prevailing public opinion. NEPA requires Federal agencies to consider environmental effects that include, among others, impacts on social, cultural, and economic resources, as well as natural resources. Thus BLM must consider both legal and social factors, in making land use decisions, such as setting and maintenance of AML and grazing allocations.

Table C-12
Wild Horses and Burros

This was highlighted in a 1982 National Research Council report on the BLM's wild horse and burro program:

Attitudes and values that influence and direct public priorities regarding the size, distribution, and condition of horse herds, as well as their accessibility to public viewing and study, must be an important factor in the determination of what constitutes excess numbers of animals in any area. . . [A]n otherwise satisfactory population level may be controversial or unacceptable if the strategy for achieving it is not appropriately responsive to public attitudes and values. ..

Biologically, the area may be able to support 500 cattle and 500 horses, and may be carrying them. But if the weight of public opinion calls for 1,000 horses, the area can be said in this context to have an excess of 500 cattle. For these reasons, the term excess has both biological and social components. In the above example, biological excess constitutes any number of animals, regardless of which class above 1,000. Social excess depends on management policies, legal issues, and prevailing public preference..."

Nearly 3,500 citizens have provided to the Carson City District comments supporting that the new RMP increase AML, increase protections and reform management of wild horses and burros under the District's jurisdiction. In fact, over the past year, the BLM has received tens of thousands of letters, emails and telephone calls from American citizens opposed to the mass roundups and removals of wild horses from public lands in the West. Americans have weighed in on the Secretary's proposed strategy for reform of the BLM program, as well as in comments on Environmental Assessments and scoping requests for Resource Management Plans.

The public's outrage over the current costly and cruel policy is increasing as is the call for a more equitable distribution of resources in the small percentage of BLM acres that have been designated as wild horse habitat. This public outcry constitutes a "prevailing public preference" and provides sufficient reason for BLM to reanalyze the division of resources within the 21 Herd Areas (HA), including at least six zeroed-out areas, under the Caron City District's jurisdiction. This strong public preference also mandates BLM to fully consider all alternatives that would accomplish this goal and avoid the mass capture and removal of wild horses from their home on public lands.

Table C-12
Wild Horses and Burros

The BLM acknowledges the need to more fairly allocate resources and to allocate more resources to wild horses and burros due to the increasing public support for these federally protected animals. The AWHPC urges BLM to incorporate a preferred alternative with the following components:

• Eliminate or decrease livestock grazing in HMAs, pursuant to 43 C.F.R. 4710.5(a), which authorizes BLM to close livestock grazing on areas of public lands"if necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury." A decrease in livestock grazing would preserve the BLM's multiple use mandate while also fulfilling the agency's mandate to preserve and protect wild horses and burros.

• Designate HMAs to be managed principally for wild horse and/or burro herds under 43 C.F.R. 4710.3-2.

• Give priority to wild horses and burros over livestock and big game species (either re-introduced/introduced) within designated HMAs.

• Re-evaluate zeroes out HAs for re-introduction of wild horses and or burros and reinstatement as HMAs.

• Minimize or eliminate harmful commercial activities within wild horse and burro areas, including gas and oil exploration, geothermal, mining and recreational vehicle activity.

• Fairly allocate forage and water resources for wild horses and burros within designated herd management areas-end the BLM practice of allocating the majority of resources within HMAs and HAs to livestock and other commercial uses.

Furthermore, AWHPC urges the Carson City District to mandate that the new RMP base AMLs on scientific and rational principles that provide adequate herd size for genetic viability and increase AML to the 150 adult animal minimum to ensure that genetic variability is not jeopardized. Wild horse and burro herds should be managed for genetic diversity and strength and not for particular physical characteristics.

The 21 HAs in the planning area constitute a small portion of the public lands within the Carson City District’s jurisdiction. On these public lands, current policy authorizes unnaturally small and genetically unsustainable wild horse populations while authorizing livestock grazing at much larger numbers.

Given the prevailing public opinion cited above, the Draft RMP and EIS must include a preferred alternative to:
• Maximize conditions for wild horse and burros populations;
• Break the unsustainable cycle of roundups and removals;
• Manage horses and burros on the range in a humane manner which both protects natural wild behaviors and does not include the permanent sterilization of animals.

Table C-12
Wild Horses and Burros

The AWHPC urges BLM to incorporate a preferred alternative with the following components:

• Enhance range conditions, including the restoration and improvement of water sources for wild horses and other wildlife species, the elimination of fencing which prohibits wild horses and burros from fully utilizing the HMAs/HAs, etc. Range rotation, re-seeding temporary fencing, restoration/enhancement of water resources, and reduction of livestock grazing must be among the tools used to protect and restore any areas that do not meet habitat or rangeland standards.

• Re-introduce wild horses to the zeroed-out Herd Areas including Tule Ridge/Mahogany Flat, Pah Rah Mountains, Horse Springs, southern portion of the Pine Nut Mountains Herd Areas (HAs) where livestock grazing continues to be permitted. Private ranchers should not profit and benefit from their unwillingness to allow wild horses to remain in these HAs - therefore all livestock grazing should cease if wild horses are not permitted in these areas.

The District's claim that due to the private-public checkerboard ownership issues, the agency eliminated all wild horses from these areas is not sufficient. The BLM has the authority to temporarily or permanently eliminate or reduce livestock grazing to provide habitat for wild horses and/or burros.
Therefore, the BLM must either work with the permittees (in the Pah Rah Mountains HA that includes the Spanish Springs/Mustang (03052), Olinghouse (03041) and White Hills (03058) allotments; in the Horse Springs HA that include the Horse Springs (03032) and Stockton Flat (03053) allotments) to either tolerate wild horses on their private lands or eliminate the privilege of grazing on adjacent public lands. This also applies to the permittees with allotments in the southern, zeroed-out portion of the Pine Nut Mountains HA which include the Buckeye (03509), Pine Nut (03576) and Churchill Canyon (03518) allotments.

• Protect predators and predator prey (i.e. mule deer, etc.) in an effort to restore natural population control mechanisms where possible and thereby restore a truly 'thriving natural ecological balance." It is essential to protect predator-prey populations in order to support predators in an area.

• Utilize a non-hormonal, reversible fertility control, such as PZP, where necessary, to control wild horse reproduction and avoid mass removals of wild horses from the range.

• Forbid the implementation of any permanent sterilization of horses and/or burros as a means to manage or control population growth.

Table C-12
Wild Horses and Burros

The RMP should support public/private partnerships for the creation of wild horse preserves and to implement in-the-wild management strategies. Such partnerships or agreements should never have a negative impact on wild horses and/or burros such as the implementation of permanent sterilization, reduction of AML, zeroing-out of an HMA, etc.

If removals of wild horses and burros move forward, then the RMP should outline the following principles which should be followed:
• Removals should be incremental (i.e. not more than 50 animals per year from any given area) to allow for natural mortality to impact herd numbers and to protect from population crashes which can occur due to severe weather conditions.

• Utilize the least-intrusive capture methods, including bait and water trapping. For the small HMAs there is no reason to utilize helicopters -water and bait trapping should be the sole means for trapping wild horses.

• Adopt a Standard Operating Procedure (SOP) to maintain the integrity of social bands during all aspects of the capture operation. (Please see attached draft SOP.)

We urge that the Carson City District prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PZP fertility control (if necessary) and the protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues. Cooperative agreements with local horse rescue and wild horse organizations should be included as a means to negate urban interface issues facing animals near human development areas.

With the sustainable, minimum feasible mandate in mind, the BLM should increase the AML for the following HMAs:
Dogskin with an AML of 10-15
Granite AML 11-18
Flanigan AML 80-124

Without the respect of the human population this will vanish. I propose that the human population be allowed on these public lands in particular all WH&B HA lands as a visitor and nothing more. In addition, for visual resources to continue, all selling and leasing of public lands must cease.

Scoping Handout - 4.1 Areas of Critical Environmental Concern

I propose that all legal HA Wild Horse and Burro range land be designated as Areas of Critical Environmental Concern and be managed principally for wild horses and burros as per the 1971 Congressional Act and for BLM to utilize their discretion under 43 C.F.R. 4710.5(a) to close livestock grazing in the Has and/or or designate this area to be managed principally for wild horse herds under 43 C.F.R. 4710.3-2. Due to past management practices of the Has Wild Horses and Burros are now in grave jeopardy of losing their genetic viability as well as their designated legal land. This can be largely rectified by BLM following the law and providing these species their designated and legal land as a principle resource. This can be done even as the land is used within a multiple use policy – but the BLM must make it's decisions on proven scientific research and not on politically driven pressure from financial interests such as mining, trophy hunting, livestock and energy corporations. These special and legal management objectives must be immediately and continually put into effect in order to protect these special and unique resources.

Table C-12
Wild Horses and Burros

Scoping Handout - 5.2 Special Status Species
Endangered Species on Herd Areas:
One animal that legally and historically lives in the CCD and must be seriously considered in the plan is the wild burro, (common names: donkey, burro or ass) and scientific name, Equus asinus. This species is endangered and clearly listed as endangered where found and the Endangered Species Act does not make any reference to exclude species that may or may not be found on other than a historical country or area – thus this includes the United States of America and the State of Nevada. For clarification, I include the following link published by the U.S. Fish and Wildlife Service species profile:
http://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=A00M Kingdom: Animalia Class: Mammalia Order: Perissodactyla Family: Equidae Listing Status:
Endangered Where Listed: WHEREVER FOUND

Scoping Handout - 8.3 Riparian
As stated in this legal document (link below) prepared by BLM, it is livestock and not wild horses that cause extensive riparian damage. Wetlands and Riparian Zones Ranchers and BLM wild horse and burro (WH&B) staffers commonly believe that horses spend less time in wetlands and riparian zones than do cattle. Under this premise the grazing of wild horses the likelihood of stream bank degradation is assumed to be less than with cattle grazing.
ftp://ftp.blm.gov/pub/whb/WHB%20EAs/EA%20NM-040-2009-082%20JANUARY%202010.pdf Thus the majority of riparian damage in the CC RMP district can be eliminated by the removal of livestock and the elimination and/or close monitoring of any and all other commercial interests being permitted to operate on public land. This monitoring and these decisions must be honestly and scientifically valid and not politically driven, as we have seen done over and over in the past.

Scoping Handout - 9.1 Wild Horse & Burro
Using the acreage that was designated to WH&B at the time of the 1971 act of approximately 53.3 million acres (42M BLM managed) and using BLM's own maximum 240 acres per horse per year (half of this usage per burro) statement the WH&B legally designated land could today accommodate 222,083 WH&B although anyone with any wildlife science training would know, with other wildlife and with natural predators on those lands the WH&B population would self-stabilize on their legal Herd Area acreage and never come close to that total. "Report to Congress Regarding the WH&B Program, BLM, US DOI: Refuting FY 2011 Budget Justification", C. Bowers, L. Peeples, C.R. MacDonald.
http://www.blm.gov/nv/st/en/prog/wh_b/appropriate_management.html

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At the present, there is no data to indicate that any WH&B population control is necessary, as the present population is at or near a NON-VIABILITY level.
- 21,354: WH&B population as of 2/28/11 using BLM's own data & 20% growth model" (independent analysis)
Compiled by Carla Bowers, 10/26/11, Revised 11/6/11 for NAS/NRC Study Panel of BLM Wild Horse & Burro Program - All numbers above are verifiable.

Designated wild horse and burro ranges (HA) are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This obviously will require reductions or closure to livestock grazing regardless of the political influence by the grazing permit holders.

Table C-12
Wild Horses and Burros

Exterior fences on all herd areas would be acceptable for the protection of the animals and the public but all interior fences in wild horse and burro herd areas must be removed allowing for the intermingling and thus genetic health of the animals as well as to allow the animals free migration and natural range rotation. With livestock grazing eliminated on legal herd areas, all riparian fencing would be unnecessary as WH&B and wildlife would automatically and naturally disperse seasonally to water sources and forage sources.

In conclusion, I urge the Carson City District Office to consider the interests of all Americans, not just local and commercial and political users of our public lands, when crafting the new Resource Management Plan (RMP) and all other land-use documents tiered to it. The new RMP must recommend options for increasing wild horse and burro appropriate management levels (AML), reinstating wild horses to zeroed-out herd areas (HA) and ensuring that wild horses and burros are afforded equitable distribution of resources within designated habitat areas.

I urge that a new RMP include the following suggestions:
• Designate all Herd Area Land to be managed principally for wild horse or burro herds as allowed under 43 C.F.R. 4710.3-2. Eliminate all livestock grazing in Herd Area land pursuant to 43 C.F.R. 4710.5(a).
• Replace outdated and costly wild horse and burro management and WH&B stock-piling that relies on mass roundups and removals with a cost-effective and science-based approach to managing wild horses and burros on their legal range.
• Eliminate livestock and other commercial usages on all Herd Area range and carefully and scientifically (not politically or financially) allocate public land resources outside the Herd Areas by making ecologically sound decisions for its uses.
• Declare all approximately 42 million acres of original BLM managed Herd Area Land as closed and off-limits to geothermal/fluid mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration, mining, OHV and livestock.
Again I state, BLM must reduce all conflicting interests within the legal 42 million acres of original and legal Wild Horse and Burro areas and restore truly long-term viable Wild Horse and Burro populations and let them prove themselves by giving them sufficient space, appropriate full, year-round habitat, and sufficient time to let Mother Nature work her wonderful miracles for all of life. This is the honest and honorable way to proceed.

Predators

A major predator of wild horse foals is the mountain lion (Felis Concolor), the most widespread wild cat in the Western Hemisphere, found from Canada to the tip of Tierra del Fuego. It can be an effective, natural control on wild horse populations as demonstrated in the Montgomery Pass area and in the Pryor Mountains of Montana (until BLM Billings encouraged the killing of the cats). Other classic killers of wild horses are wolves and grizzlies. The former is only rarely present in HMAs.

We recommend that BLM work with the Nevada Department of Wildlife to decrease mountain lion hunting permits in wild horse HMAs. The Act mandates that BLM work in consort with other agencies to more effectively manage wild horse herds.

Sustainable implies self-sustaining, which requires maintaining a genetically viable population of at least 150-200 adult animals in order to have a minimum genetic effective number of 50 (active and successful breeding adults), according to Gus Cothran, PhD, the most respected equine geneticist in the United States. Dr. Cothran has reviewed the genetics of wild herds for years and, in the case of the Pryor Mountain Wild Horse Herd, for decades.

Table C-12
Wild Horses and Burros

Conflicts in Urban Areas

We recommend that BLM explore safe and effective methods to mitigate vehicle collisions with wild horses and burros rather than rounding up and removing them.

Streiter-Lites have reduced nighttime deer/auto collisions by 78-90%. The cost is minimal at $10-15 thousand dollars per mile. This includes installation, labor, and parts, and is far cheaper than roundups and subsequent holding. This technology would pay for itself quickly as most collisions would be avoided. Coupled with proper signage along roads where collisions have occurred in the past, accidents could be eliminated in the future. This would have been far cheaper than the "nuisance" roundup of burros in the Bullfrog HMA earlier this year.

Under the Federal Highway Administration's Highway Safety Improvement Programs 90% funding is available, another cost savings to BLM, particularly if local and state government agencies apply for this funding.

If reduction in livestock grazing still falls short in allowing for viable wild horse herds, then expansion of range boundaries must be implemented. Each of the above areas is surrounded, at least in part, by BLM lands. Most HMAs are smaller subsets of the original areas legally designated for the herds (HAs). If this is the case in Dogskin, Granite, and Flanigan, then expanding the boundaries to those original HA boundaries is well within the legal authority of the Carson City District. Or, if the areas are surrounded by other BLM lands, then expanding the range to allow for a viable herd should be undertaken.

We recommend that BLM work with the Battle Mountain District to restore the Mount Airy HA to HMA status, which would allow for the expansion of the Desatoya Herd.

If under populated HMAs have boundaries with other HMAs, then horses must be allowed to naturally interchange with neighboring herds so that genetic interchange is available and will enhance variability. This is not to say that combining two areas relieves the Agency from managing each and every HMA at a sustainable level.

The removal of interior fencing within the HMAs should be a major emphasis of BLM to avoid the further segregation of small or large herds. And it might act to keep wild horses within the designated boundaries of the HMAs.

Fence removal projects could be accomplished by volunteers. The Cloud Foundation would volunteer to participate and would encourage others to do the same.

If a herd is in close proximity to another herd, consideration should be given to linking the herds by creating a wild horse corridor. We recommend that consideration be given to the creation of a wild horse corridor (underpass under Highway 50), which will connect Clan Alpine HMA with Desatoya HMA.

Restoration of Zeroed Out HAs

Four HAs: Pah Rah, Horse Springs, Jumbo, and Tule Ridge/Mahogany Flat should be considered for repatriation by horses currently in short term holding facilities to take pressure off maxed out short term holding areas that represent nearly half of all wild horse holding costs.

Table C-12
Wild Horses and Burros

Restoration of Zeroed Out HAs

Four HAs: Pah Rah, Horse Springs, Jumbo, and Tule Ridge/Mahogany Flat should be considered for repatriation by horses currently in short term holding facilities to take pressure off maxed out short term holding areas that represent nearly half of all wild horse holding costs.

The Montgomery Pass wild horse herd has not had any manipulation or removals for 30 years due to mountain lion predation on foals. It is an HMA that was reduced in acreage from its original HA boundaries. Instead of rounding up these horses, which will put even more pressure on holding while unnecessarily increasing the bill to taxpayers, and destroy the opportunity for continued research on an un-manipulated herd, we recommend expanding the range. Expansion could mitigate the allegations of "trespass" by this one-of-a-kind herd. The U.S. Forest Service (FS) has a co-responsibility to manage wild horse and burro herds on their lands. With this in mind, we recommend that BLM coordinate expansion efforts with FS.

Marietta is the only range dedicated to wild burros in the West to our knowledge. It is a strikingly dramatic landscape and the burros here and elsewhere are a favorite with the public.

With this in mind, we recommend that the Marietta Wild Burro Range be managed for a genetically viable herd with a natural sex ratio. The BLM should appreciate and encourage the eco-tourism possibilities associated with this herd and its neighbor, the Montgomery Pass herd that is regularly visited by tourists both on foot and horseback. The boost to local small town economies in both California and Nevada should be considered in management decisions.

There are few burros remaining the West, and of the remaining herds, few are genetically viable. Dr. Cothran, in his recent presentation to the National Academy of Sciences, made this very point. Marietta is no exception, unfortunately. BLM has failed to keep its promise to the American public, failing in almost all cases to manage burros for sustainability.

We recommend you raise the AML in the Marietta Wild Burro Range.

Removal Alternatives

In keeping with the "minimally feasible" management clause of the Act, BLM must explore options which are less invasive and do not involve a nearly exclusive roundup/removal strategy. It has not worked and is not sustainable financially. It has resulted in 2/3s of the herds being managed at less than viable population levels on the range.

Helicopter roundups and subsequent removal of animals of all ages have dominated the management philosophy for far too long, and nearly bankrupted the agency, leaving few dollars for range monitoring and range improvement projects within the few remaining HMAs (179 remain of the original 339 designated). It is a policy that flies in the face of the "minimum feasible" management clause of the Act.

Table C-12
Wild Horses and Burros

PERMANET STERLIZATION SHOULD BE PROHIBITED
Experts have outlined the negative impacts of permanent sterilization to wild horses. Please see attached expert declarations from AMERICAN WILD HORSE PRESERVATION CAMPAIGN, et al., vs. KEN SALAZAR, Secretary Department of the Interior, et al. UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 2011. Expert declarations submitted in the above mentioned lawsuit outline the serious negative impacts of castrating wild free-roaming stallions and the inconsistency of a sterilization policy with the federal Wild Free Roaming Horses and Burros Act. It should be noted that, after receipt of these declarations, the BLM withdrew its plan to convert two wild free roaming horse populations in southern Wyoming to herds comprised primarily of castrated stallions.

The expert declarations are being submitted with these comments (See attached four declarations) and must be included in the Administrative Record for the preparation of the RMP. The declarants requested that the AWHPC note for the record that while the declarations are specific to the above mentioned lawsuit, each of the experts has stated that the information contained within each of their declarations applies to all wild horses and all wild horse herds and should be considered and applied to the horses under the Carson City District's jurisdiction.

We recommend that a complete review be made of all Appropriate Management Levels (AMLs) within the Herd Management Areas (HMAs) managed by the Carson District.

AMLs should reflect the true intent of the Wild Horse and Burro Act (the Act) in regards to "principally but not necessarily exclusively" clause. At least 51% of forage should be allocated to wild horse use, rather than the tiny portion currently allocated. This may require decreasing the number of privately owned livestock on these HMAs. Livestock grazing is a discretionary use of public lands and, as such, BLM has the statutory authority to reduce or eliminate livestock grazing by permittees. On the other hand, BLM is required to manage for "sustainable" herds of wild horses and burros.

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1) HERD MANAGEMENT AREA BOUNDARY LINES AND SIZE:
Specifically, when revising RMP for the Carson City District, the following actions/principles should be incorporated:

Boundary lines need to be drawn that include viable year-round water sources as well as sufficient forage to maintain a genetically viable population. Dr. Gus Cothran, the BLM's acknowledged authority, is clear that the size of a "viable" herd is 150 to 200 reproductively capable animals. This doesn't mean no PZP should be used; it simply means the genetic contribution must be that size to maintain the integrity of the respective species.

The vast majority of users of public land have considerable resource available to their use. Wild Horses and burros are restricted to the boundary lines that, in many cases, were inaccurately drawn. This finite, and flawed, space is vital to the survival of this American Heritage species as intended by Congressional law.

Populations capable of breeding to sustain genetic viability, without interference, must be maintained before other uses are allowed

If current boundary lines do not allow for that viability standard, the authority to change those lines currently exists and must be utilized. If areas are too small to accommodate the viable population, then HA land bordering the HMA can and must be added.

Table C-12
Wild Horses and Burros

ON-THE-RANGE MANAGEMENT STRATEGIES SHOULD BE GIVEN PRIORITY AWHPC urges the Carson City District to develop an alternative to re-focus resources to on-the-range management strategies to avoid mass roundups and removals of wild horses and burros. As stated above, such tools include repair and enhancement of water resources, removal of fencing, PZP fertility control (if necessary) and protection of predators to restore ecological balance. In addition, the "zeroing out" of wild horse or burro herds must be avoided and range rotation, re-seeding temporary fencing and reduction of livestock grazing should be utilized to protect and restore any areas that do not meet habitat or rangeland standards. Roundups should only be conducted in verifiable emergency situations. If necessary, roundups must be conducted with respect for the social integrity of wild horse herds; family bands should be relocated intact.
The vast majority of users of public land have considerable resource available to their use. Wild Horses and burros are restricted to the boundary lines that, in many cases, were inaccurately drawn. This finite, and flawed, space is vital to the survival of this American Heritage species as intended by Congressional law. Within these boundary lines horses and burros are to be considered a principle, but not exclusive, use. Currently they are not managed as such. This mandated use is the lowest of priority.
To perpetuate a use of public land the viability of that use must be first priority. Populations must be managed to perpetuate the species with a minimal level of interference. Populations capable of breeding to sustain genetic viability, without interference, must be maintained before other uses are allowed.
Numbers within the boundaries of HMA's should all be given a minimum management level of 150 individuals that are of reproductive age. If current boundary lines do not allow for that viability standard, the authority to change those lines currently exists and must be reviewed. If areas are too small to accommodate the viable population than HA land bordering the HMA can be added. If areas are too small to support a viable population than the real possibility that the lines were flawed must be taken into account and corrected.
I also consider it vital that public/private cooperatives be made to adhere to all standards as any contractual agreement and must be made available for public comment and competitive bid. Any public cooperative that requires removal, handling or range repair (springs, fencing) must be reviewed carefully against any standard of conflict of interest. No person or entiity that holds an allotment permit for livestock grazing should be allowed to ALSO hold any permit to remove wild horses from any public land.
The language in the standing RMP (quoted below) must be enforced with the recognition that this language applies to all permitted activity including extractive industry. "Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly."
Please recognize that the vast majority of the public is unaware of the decision making process on public land. There is an assumption that horses exist protected and viable due to an act of Congress. A greater effort needs to be made to educate the public to the multitude of projects that have potential impact. The damages to wild horses are not being appropriately mitigated without public participation, yet the public remains uneducated to the process.

Table C-12
Wild Horses and Burros

The impacts to sex ratio skewing are not fully understood. Until further data is available that clearly demonstrates a population control impact without adverse effect to herd behavior it should be suspended. PZP should only be utilized within the confines of known seasonal effectiveness. Under no circumstances should surgical sterilization of mares be employed as the risk of infection and death is too great. Currently surgical sterilization of stallions should not be employed until impact to the behavioral structure on the range has be adequately documented.
The Carson City District should adopt a humane care standard for all roundups and with facilities in the district. Until the National office compiles and implements a policy the district should implement an interim policy to ensure the humane handling of animals.
The expectation is that the Environmental Assessment associated with the proposed revision will adequately document the risks to the HMA's occupied by our protected wild horses from the extractive industry coming into these ranges. Any permit that adversely effects the areas occupied by wild horses and burros must effectively replace, repair, restore and all damages, encroachments or loss of surface use. If those projects can not effectively do so they must be denied.
Moreover, wild horse and burro populations must be kept at an adequate herd size in order to insure generic viability -- at least 150 adult animals. If over-population is a concern, then a reversible fertility agent such as PZP can be used. Gelding or spaying is not an appropriate option. I urge the Carson City District to honor the BLM's mandate to protect and preserve our wildlife, in this case our wild horses and burros.
I am writing to ask that the revised RMP prioritize wild horses and burros according to law and the will of the American people. My concern is for the protection of the place wild horses and burros legally and historically are to occupy. Their legal, rightful habitat is steadily being encroached and their legal presence minimized, and I write to ask that this practice be reversed in the new RMP. How very refreshing that will be. When directed by law to consider them "an integral part of the natural system of the public lands," we need to give flesh and bone to that mandate by actually preserving and prioritizing land principally but not necessarily exclusively (to quote the law) for them. Currently it is cows and sheep that are defacto managed as "integral," with the vast majority of the range's resources being allocated to them.
We pay millions of taxpayer dollars to round-up and pen wild horses in places far away from their stomping grounds. That money should instead be spent by the BLM to restore and improve land and water resources of the public lands.

Table C-12
Wild Horses and Burros

2) Public/private cooperatives
Public/private cooperative arrangements must adhere to all standards as any contractual agreement and must be made available for public comment and competitive bid. Any public cooperative that requires removal, handling or range repair (springs, fencing) must be reviewed carefully against any standard of conflict of interest.

No livestock grazing permittee should hold any permit to remove wild horses from any public land.

The language in the standing RMP (quoted below) must be enforced with the recognition that this language applies to all permitted activity, including extractive industry.

Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly.

3) PUBLIC INFORMATION AND PARTICIPATION
The vast majority of the public is unaware of the decision making process on public land. There is an assumption that horses exist protected and viable due to an act of Congress.A greater effort needs to be made to educate the public to the multitude of projects that have potential impact. The damages to wild horses are not being appropriately mitigated without public participation, yet the public remains uneducated to the process.

4) GENDER/SEX RATIO SKEWING
The practice of artifically skewing the gender ratios of wild horses on the range must stop until studies are done. It is the height of irresponsibility to foist such conditions on a wild population while never having studied its effects on herds and individuals, and litigation must ensue if this practice isn't stopped until studies are done The impacts of sex ratio skewing on the herds and individual animals have never been studied and are not fully understood.

5) FERTILITY MANAGEMENT STRATEGIES
A) PZP should only be administered at the appropriate time of year to help avoid out-ofseason births.

Under no circumstances should surgical sterilization of mares be employed as the risk of infection and death is too great. Sheldon studies on mares spayed through the anus are anecdotal. I spoke with Paul Steblein, who ran the Sheldon National Wildlife Refuge during these studies. They release these mares within two days of this invasive procedure, and no study has followed these wild mares, who may very well have all died within a month of the study. This is a great travesty, and these wild mares should never be subjected to such random experimentation. There was a 10 percent death rate on the procedure initially, but since there is no follow-up study, we don't know how much or if that has improved.

B) Vasectomies on stallions must not employed until at least a 10 to 20-year study documenting the impact of this practice on the herd and on the genetics of the wild population is done. This practice may very well simply reduce the genetics of the populations and have no impact on reducing population growth.

Currently surgical sterilization of stallions should not be employed until impact to the behavioral structure on the range has be adequately documented.

Table C-12
Wild Horses and Burros

C) Gelding stallions and reintroducing them to the wild as a "nonreproducing herd" is illegal and should never be considered in a wild population. The 1971 Act defines a herd as "a stallion and his mares." There is no place in a wild population for herds of geldings. This fails to meet the "minimum feasible management" standard mandated in the 1971 Wild Free Roaming Horse and Burro Act.

6) HUMANE CARE STANDARDS FOR ROUNDUPS AND SUBSEQUENT HANDLING
The Carson City District should adopt a humane care standard for all roundups and with facilities in the district. Until the National office compiles and implements a policy the district should implement an interim policy to ensure the humane handling of animals. This includes:

A) mounting a live video camera on any active helicopter;

B) placing a distance limit and temperature limits on distances horses can be made to travel and weather conditions injurious to such strenuous activity, e.g., no roundups over 78F degrees or under 35F degrees;

C) Obtaining and making public the GPS coordinates of the trap site and the place the pilot first starts to drive the band. Additionally, the pilot shall report the band's composition (i.e., "nine horses consisting of: one stud, three mares, two foals, three yearlings). This will provide true transparency as to what's really going on out there and is entirely doable since the technology already exists onboard every helicopter used for roundups.

7) RISKS FROM EXTRACTIVE INDUSTRY
The Environmental Assessment associated with the proposed revision must give a thorough assessment of the very real impacts and threats to the integrity of the HMAs from extractive industry coming into these ranges through land leases, etc. Any permit that adversely effects the areas occupied by wild horses and burros must effectively replace, repair, restore and all damages, encroachments or loss of surface use. If those projects can not effectively do so they must be denied.

All HMA's are suitable for management. Under authority given in the1971 Act, the Secretary set up "sanctuaries" (or Herd Areas). The land base and resources have been eroded and taken from the protected American Heritage Species and utilized for other interests in defiance of the unanimous Congressional mandate to consider wild horses and burros "an integral part of the natural system of the public lands."

It is my request and desire, along with thousands of other Americans, that the revised Resource Management Plan at this critical time must focus on restoring the management of wild horses and burros on their entitled public land as a prioritized use.

Other recommendations on management of a HMA is to develop a management plan for the herd with objectives on sex ratios, age structure, reproduction rates, and capture schedules and intervals. Included in this plan should be objectives on the type of horses that should be maintained in the HA. Type of horse could include physical characteristic such as age, sex, height, weight, coloring, conformation. This would help guild what horses would be turned back out after a gather. The goal would be to have a horse that is suitable for the environment it is in and also to produce a horse that would meet that adaptation demand.

All HMA's are suitable for management. Under authority given in the ACt of 1971 the Secretary set up sanctuaries (or Herd Areas). The land base and resources have been taken from the protected American Heritage Species and utilized for other interests. The impetus at this juncture needs to be on the management of wild horses and burros on their entitled land as a prioritized use.

Table C-12
Wild Horses and Burros

BLM Question: Where are habitat improvement projects appropriate? What kinds of improvement projects are feasible?
Range rotation, re-seeding, temporary fencing, restoration/enhancement of water resources, and reduction of livestock grazing are appropriate habitat improvement projects. Such projects could be done in conjunction with non-profit organizations and local citizens interested in maintaining wild horses and burros on the range and preventing the removal of these animals from public lands. Please see additional habitat improvements listed herein.

What criteria should be used to make habitat and populaon suitability and viability determinaons?
Scientific research that is fully vetted that includes the study of impact of all large animals utilizing the land (cattle). An additional comment: studies of African wildlife populations and the effects of drought and cattle raising shows that habitat goes through big temporary changes, some of which do not look attractive. Bounceback should be the important factor.

Currently AWHPC is undergoing litigation to prohibit the BLM from utilizing the castration of wild stallions as a population growth suppression method. The BLM lacks any studies or empirical data which outlines the impacts of such an extreme management method that is irreversible. Therefore, the Carson City District should prohibit the permanent sterilization of any horses and burros in its RMP.

SEX RATIO SKEWING SHOULD BE PROHIBITED
The BLM lacks any studies, papers or concrete data relating to the impact to individual horses, bands and/or herds, sex ratio skewing; without the completion of significant scientific studies which outline and understand the implications of sex ratio skewing on the range must be eliminated as an alternative management method.

Maintain natural sex ratios; currently there is no empirical data which sets natural sex ratios at 50/50 therefore the negative impact of sex ratio skewing remains unknown. If sex ratio skewing is proposed as part of any alternative, then the EIS and RMP must thoroughly analyze its potential behavioral and social impacts on individual horses, female horses, the herd and environment. Scientific justification for, or analysis of, the impacts on natural herd dynamics must be provided. Other BLM field offices have examined the impacts of sex ratio skewing. For example, the BLM Beatys Butte EA DR FONSI 2009 [http://www.blm.gov/or/districts/lakeview/plans/files/Revised_BButte_EA_FONSI_DR_09012009.pdf] (page 33) states,
"If selection criteria leave more studs than mares, band size would be expected to decrease, competition for mares would be expected to increase, recruitment age for reproduction among mares would be expected to decline, and size and number of bachelor bands would be expected to increase. . . ."

SCIENTIFIC DATA SHOULD BE REQUIRED AS CORNERSTONE OF DECISIONS
The Carson City District RMP must call for a number of studies and actions related to long-term determinations for wild horse and burro population numbers. These include:
• Studies outlining data of impacts and effects of water development and availability, fencing, herd distribution patterns (by specific animals and season), vegetative rehabilitation and other wildlife and range development projects on the location, and movement of wild horses.
• Monitoring studies on herd on herd viability, range condition, viewing opportunities, cooperative management opportunities, and range development proposals.

These results of these studies must be provided with the RMP and EIS, along with all rangemonitoring and other studies focused on the impacts of all livestock grazing on public lands, both in HMAs, HAs and outside of these areas, within the Carson City District's jurisdiction.

Table C-12
Wild Horses and Burros

RMP MUST ENSURE THAT ALL OPERATIONS ADHERE TO HUMANE STANDARDS

An alternative to ensure humane standards for capture of wild horses and application of PZP fertility control. The District should adopt a Standard Operating Procedure (SOP) to maintain the integrity of social bands during all aspects of the capture operation. (Please see attached draft SOP.) This will minimize the negative impacts and reduce the stress on animals captured in a Catch-Treat-Release (CTR) roundup for the administration of PZP. In addition, keeping social groups intact may also eliminate heightened compensatory reproduction which is a possible outcome of the continual roundups conducted by the BLM.

In addition, an alternative that adheres to the guidelines suggest in the Humane Society of the United States (HSUS) report to the BLM regarding roundups. The report recommends the installation of real-time video cameras on helicopters and at trap and holding corral locations, as well as guidelines that prohibit the helicopter driving and capture of horses in extreme temperatures, both cold and hot. (See attached HSUS report.)

LEAST INTRUSIVE CAPTURE METHODS; ALTERNATIVES TO HELICOPTER STAMPEDES

The RMP should mandate that the least-intrusive capture methods should be utilize if the BLM must proceed with removals. These include bait and water trapping, and capture and removal of horses in intact social groups in order to minimize trauma and stress.

TRANSPARENCY IN ALL ASPECTS OF MANAGEMENT

The RMP must ensure transparency of the management of wild horses and burros. This includes all capture operation activities and includes providing meaningful public observation opportunities during roundups. Public observation throughout each day of the operation should be mandated in the RMP. This includes scenarios when the District intends to locate the trap site or holding corrals on private land - in which case if the land owner does not agree to public access, the BLM should identify alternative property on which to conduct the government operation. It is important that the public be allowed to observe all horses brought into the trap, all horses at holding facilities and the release of all horses. The public must be allowed to arrive at the trap prior to the first horses brought into the trap and remain until after the last horses are brought in that day. In order to provide meaningful proximity to the trap site for public observation, the BLM may establish an observation "pool" by which a small number of individuals are allowed within close proximity to the trap to observe and document the animals and operation. The individuals in the pool would alternate with other public observers present. Carson City District must mandate that transparency is a cornerstone of its management and operation.

Table C-12
Wild Horses and Burros

SUPPLEMENTAL RESPONSES TO RMP PLANNING QUESTIONS
Following are specific answers to questions listed in the RMP 9.1 Wild Horses and Burros Fact Sheet:
BLM Question: Should HMA boundaries be adjusted, combined and/or eliminated?

HMA boundaries should be adjusted to reincorporate any zeroed-out portions of that original HA. One example where this boundary adjustment should take place is with the Pine Nut Mountains HA-- where the large southern portion of the HA has been zeroed out, yet livestock grazing continues to be permitted. If habitat is suitable for livestock it is suitable for wild horses and burros.

Under the current definition of wildlife, wild horses and burros are covered under Nevada NRS 533.367 which requires all permit holders for springs or seeps to allow access to wildlife that customarily use it. Therefore private ranchers must permit wild horses and burros to access water in the state of Nevada. The BLM must legally enforce this state requirement and cannot claim that ranchers do not allow wild horses and burros to access their "private" water sources. Because Nevada is a "fence out" state-- if a rancher does not want wildlife-- including wild horses and burros on his private property he is responsible to construct fencing. The BLM should not zero-out wild horse and burro herds to accommodate ranchers who do not want the animals on their property or using their "private" water sources.

Fencing or other unnatural boundaries which prevent horses from crossing into different HMAs/HAs should be eliminated-- it is unnecessary to combine HMAs to accomplish this.

BLM Question: What criteria should be used to make habitat and population suitability and viability determinations?

Simply put, if the BLM permits livestock grazing in an area- whether seasonal or year-round- the agency cannot claim that the habitat cannot accommodate wild horse and/or burro herds. Population suitability and viability determinations must enable self-sustaining herds- this means each herd must be genetic viability and therefore, the criteria must include the requirement that AMLs are never lower than the 150 adult animal minimum which is needed to ensure that genetic variability is not jeopardized. Establishment of AMLs for wild horses and burros should be based on sound science and actual range monitoring data which differentiates between the impacts of livestock and wild horse/burro grazing.

At minimum wild horses and burros should be allocated at least the same, if not more, resources than livestock is allocated in that same area.

Table C-12
Wild Horses and Burros

BLM Question: What methods, other than removal through gathers, should be considered to achieve AMLs?

Please see above for additional information regarding the use of non-hormonal, reversible fertility control, such as PZP, and the strong argument against the permanent sterilization of wild horses and burros or sex ratio skewing. The RMP should accommodate, either permanently or temporarily, wild horse and/or burro population numbers over AML through conversion of livestock grazing AUMs to wild horses and burros while simultaneously utilizing reversible, nonhormonal fertility control to suppress population growth.

In addition, water/bait trapping should be used as an alternative to helicopter roundups whenever possible-- especially in areas where water or forage are limited.

Lastly, predator and predator prey protection should be supported by the BLM given its mandate to manage for a "thriving natural ecological balance" which cannot be achieved without predators.

I appreciate the opportunity, as an interested party to wild horses and burros, write to you today. When crafting the new (revisions) RMP for the Carson City District I believe the following information should be paramount as this MANDATED use has become threatened by the encroachment of other users.

BLM Question: What age structure and sex ratios are appropriate to ensure healthy future herds of wild horses and burros?
The BLM lacks any data to support the artificial manipulation of age structure and sex ratios- therefore until such research and data is made available to support these methodologies such artificial manipulations should not be implement due to the unknown detrimental impacts such actions may have on individual animals, social groups and herds. See above for further information on this topic.

AVOIDANCE OF HARMFUL POPULATION CONTROL METHODS
AWHPC urges the Carson City District to prohibit the following population growth suppression methods, including:
• Surgical and/or chemical sterilization of horses;
• Use of fertility control drugs which are either permanent or have a hormonal affect on the animal -utilizing such drugs would be counter to the intent and legal requirement of federal laws which require that the BLM manage wild horses and burros in minimal feasible manner and that wild behaviors must be protected (neither of which would be upheld if sterilizing or hormonal drugs are administered);
• Skewing of sex ratios to favor males as a method to suppress population growth must be eliminated as an alternative because the harmful impacts on wild horse behavior are undocumented and should not be permitted until the impacts are understood. Without proper research and study, sex ratio skewing could have detrimental long-term impacts on wild horse herds that are currently unknown.

BLM Question: When is it appropriate to develop or augment water for horses and burros?
It is always appropriate to develop or augment water for horses and burros in order to more evenly distribute animals on the range and/or alleviate the over-utilization of areas surrounding water sources. Guzzlers, environmentally-friendly water source protection and other means to provide water should be undertaken to mitigate the need to remove wild horses and burros from the range.

Table C-12
Wild Horses and Burros

Following are specific answers to questions listed in the RMP 6.3 Grazing Fact Sheet:
The Carson City District currently permits 156,731 Animal Unit Months (AUMs) for use within the district-- that is the annual equivalent of 13,060 wild horses. This disproportionate allocation of resources on out public lands must be reformed.

BLM Question: How should vacant allotments be managed?
Vacant allotments should be used as substitution for allotments in HMAs and HAs-- this would allow the permittees an opportunity to relinquish AUMs in an HMA/HA and allow the BLM to reallocate those AUMs within the HMA/HA to wild horses and/or burros.

BLM Question: What criteria should be utilized to determine if additional forage is available to consider Temporary Non-Renewable (TNR) grazing above the preference and/or authorize temporary changes in use that are deemed outside the terms and conditions of the permit?
If the range and riparian areas are not meeting all standards for rangeland health, livestock grazing should not be permitted. In addition, if additional forage is available within HMAs and HAs that should be allocated for wild horses and burros which are federally-protected animals. The BLM should not expand grazing "outside the terms and conditions of the permit."

Are there public lands that should be withdrawn from mineral entry because of conflicts with other public land uses?
AWHPC urges the BLM to withdraw HAs and HMAs from mineral development because it negatively impacts wild, free-roaming horses and burros and infringes on the public's ability to enjoy these animals in their natural environment. Mineral development is known to increase vehicle traffic, creates environmental noise which is detrimental to wildlife such as wild horses and burros and creates a public nuisance.

How should geothermal development be managed to minimize resource conflicts?

The RMP must outline strict parameters where geothermal development is not permitted -specific areas, including all HAs and HMAs, should be off limits to such development.

Vegetation: BLM's primary responsibility to manage vegetation to support all of the multiple uses of public lands is a critical one. Ensuring the achievement of standards and guidelines for healthy rangelands for the grazing and wild horse and burro programs is a good first step. The RMP should address which allotments and HMAs are meeting these requirements and what actions the BLM is taking to ensure that non-attainment problems are resolved, with specific deadlines for "progress" to be made. Correcting poor management is much more cost-effective than "treatments" to achieve healthy rangelands. The benefits and costs of proposed vegetative treatments should be closely evaluated, especially to sensitive wildlife, in order to avoid the listing of additional species harmed by these projects. Livestock and WH&B numbers and seasons of use should be adjusted in order to achieve requirements for healthy rangelands and to provide adequate habitat for wildlife. Non-native plants should only be used temporarily to stabilize lands disturbed by wildfires or other events until native vegetation can recover. What is the status of vegetation monitoring in the CCD? Is effectiveness monitoring required and implemented on vegetative treatments?

Table C-12
Wild Horses and Burros

Wild Horse and Burro Management: The RMP should evaluate the impacts of WH&Bs on habitat for TES species, specifically the candidate species, Greater Sage Grouse, and reverse adverse impacts by lowering AMLs or changing HMAs. Are WH&Bs meeting standards and guidelines for healthy rangelands in HMAs and HAs? If not, the BLM must make changes to both AMLs and HMAs. Can fertility control measures be more effectively used to limit population growth and eliminate unnecessary gathers? We strongly support increased BLM efforts in adopting WH&Bs. HAs should be evaluated to determine if sufficient water, forage, or other habitat factors are adequate to support sustainable WH&B use, and if not, horses should not be allowed in those areas or portions of those areas, until limiting factors are addressed and habitat is adequate to support WH&B use. The RMP should evaluate the costs and benefits of wild horse management practices as well as their effectiveness. The RMP should evaluate its WH&B program in the CCD in order to ensure that Congressional mandates to manage WH&Bs to maintain a "thriving natural ecological balance" are being met.
The EA for the South Steens Wild Horse Gather [http://www.blm.gov/or/districts/burns/plans/files/SSteensGatherEAandFONSIFinal.pdf] (page 41) states, "Skewing the sex ratio of stallions v. mares would result in a destabilization of the band (stallion, mare and foal) structure moving it from five to six animals to three animals. Social band structure will be lost resulting in combative turmoil as surplus stallions attack a band stallion trying to capture his mare. This could result in the foal being either killed or lost. The mare and foal will not be allowed to feed or water naturally as the stallion tries to keep them away from the bachelor bands of stallions, resulting in stress to the mare during her lactation condition."
The survival of our wild horses and burros is tied to the BLM's allocation of land and water resources. The Carson City District Office must prepare a new Resource Management Plan which provides equitable management of wild horses and burros in the targeted 21 Herd Areas and the 6 "zeroed-out" areas.
BLM Question: Which HMAs are suitable for the long-term management of wild horses and burros? All HMAs are suitable for the long-term management of wild horses and burros. If HMAs or HAs are suitable for livestock grazing they are suitable for the long-term management of wild horse and burros. See above for data supporting the reintroduction of wild horses in zeroed-out HAs.
Nevada is a tourist destination for the younger members of our family and they would to see wild horses IN The Wild, not in dry lots. Let's take care of our horses and make sure they have enough land to live on.
In addition, the Environmental Analysis for the RMP should include hard data on range conditions, impacts of livestock grazing on the range and a clear delineation on maps and in the analysis of the impacts on wild horses and/or burros caused by all commercial uses allowed within the HMAs. Water usage should be clearly defined and allocated -- and fair distribution of this valuable resource must be a cornerstone of the RMP -- commercial usage of public lands should not receive the lion's share of the water resources. Wildlife, including wild horses and burros, should receive adequate allocations. Stop catering to your corporate paymasters, the cattle ranchers....especially at the expense and suffering of the horses. The corruption and influence peddling is obvious to everyone. Be ashamed.
Do not round up horses, leave them on the range.

Table C-12
Wild Horses and Burros

The right thing is to work for the benefit of all and to show integrity. The original purpose of the BLM was to manage and preserve designated lands for the benefit of the wild horses. See, there was a time when this country's lawmakers knew and understood that the wild horses are a national treasure. They belong to all of us. By "removing" them for the big oils companies' gain or the cattle ranchers gain you are showing that you are against the American people and their national treasure!
Please stop these actions against our natural born horses! Giving in to the demands of rich ranchers does not give your state a good PR image!
We always hear the U.S. criticize other nations as to horrendous treatment of their people and their animals. It's time to look ourselves in the mirror, practice what we preach, not CLAIM to be a moral, compassionate country but to DEMONSTRATE our values, leading the world by setting a fine example. Everything seems to be about money these days. What would happen if we tried a little kindness and used some common sense?
I realize farming and ranching is incredibly hard work at any time and I appreciate all they do for our country. But there has to be some HUMANE solution and I believe this to be it! These wonderful creatures, who have served mankind for centuries, remain symbols of the freedom we all hold so dear.
Do not round up the horses, then take them to small pens. What is going on with allowing this to happen. Let them roam in the range.
Please read this message on behalf of the people who desire kinder treatment of our wild horses. We urge you to take to heart the following actions to help keep our wild horses on the land they have a legal right to inhabit. Thank you.
Please be kind to wild horses and burros! They are the icon of the American West and are much beloved by Americans.
We must implement a strategy that is conducive to restoring adequate land to our wild horses and burros. I resent the commercialization of our public lands to the detriment of our wildlife. We are supposed to be protecting the land and its creatures not destroying it. Greed need not lay waste to our animal species and our public lands. We can manage our wild horses - the very symbol of freedom in America - without destroying them.
Quality of life for all people and animals should not be based solely on economic profit criteria. Wild horses and burros deserve to live and their numbers managed by humane natural methods as cited above.
Every time I hear politicians talk about the federal deficit, I shake my head over the amount of taxpayer dollars that is spent rounding up wild horses and burros to appease the cattle industry. The BLM was designed to oversee public lands for the entire country, but this agency has turned into a lap dog for cattlemen. Every time I look at a hamburger, I think about the countless suffering inflicted upon wild horses and burros and have a salad instead.
When are we going to be smart enough to understand that in the state of Nevada wild horses could be used as an assets for tourism and educational purposes?
It is time to listen to the American public. It is Time to think about preserving our majestic and iconic mustangs and burros!! It Is Time for the Horse not more removal. They must be ensured survival to the fullest. I demand change toward protecting them not removing and shutting them away imprisoned. It is time to allocate more land for the horses and burros, in lieu of removing more horses and burros. All that land....can surely have more allocated to their families and lives. It is ridiculous the little they have and the cattle get the large majority.

Table C-12
Wild Horses and Burros

I worked on one of the largest ranches in Wyoming so I know 1.8 million acres is enough land for this amount of horses plus the burros , you also have six zerod out HAs so its time to start releasing some of the "PENNED" horses Its my tax dollars youre using to keep these horses corralled. STOP THIS INSANITY and STOP letting the cattle ranchers bully you(OR pay you off)
Please implement only humane procedures with regard to all horses and burros. Slaughter should NEVER be an option for any horse or burro. Please do not allow the shipment of horses or burros toany other country for the purpose of slaughter. It seems that there is much profit to be made by those involved in the unfortunate mismagement of horses and burros. PLEASE BE HUMANE.
WILD HORSES AND BURROS ARE MOST VALUABLE TO ME AND MY FAMILY. WE CAN BUY BEEF FROM OTHER SOURCES, BUT THIS IS WHERE THESE WILD HORSES AND BURROS HAVE TO LIVE. BLM SHOULD PUT THE INTERESTS OF ALL AMERICANS IN HAVING HEALTHY, STABLE WILD HORSE AND BURRO POPULATIONS ABOVE RANCH LAND SUBSIDIES TO SMALL NUMBERS OF PEOPLE.
WILD HORSES AND BURROS ARE ALSO IMPORTANT TO WILD ECOSYSTEMS, BECAUSE HORSES EVOLVED IN NORTH AMERICAN AND CONTINUE TO CONTRIBUTE TO THE ECOSYSTEMS IN POSITIVE WAYS. MY FAMILY ENJOYED SEEING THE WILD HORSE FOSSILS AT THE HAGERMAN FOSSIL BEDS, FOR EXAMPLE. ECOLOGICAL RESEARCH SHOWS THAT BUFFALO IN NORTH AMERICA FUNCTION DIFFERENTLY THAN CATTLE IN ECOSYSTEMS AND THE SAME FOR ZEBRA IN AFRICA COMPARED WITH OTHER LARGE HERBIVORES. EACH ANIMAL CONTRIBUTES TO THE ECOSYSTEM IT IS DEVELOPED TO BE IN. IN THE SAME WAY THE NATURAL EXPANSION OF WOLVES BACK INTO THEIR TRADITIONAL ROLES BENEFITS ECOSYSTEMS AS WELL AND PROMOTES A WIDER VARIETY OF SPECIES AND MORE BALANCED NUMBERS. I AM SORRY I DON'T KNOW IF WOLVES ARE ONE OF THE PREDATORS NATIVE TO ALL OF NEVADA, BUT HAVING WILD HORSES AND BURROS IS COMPLEMENTARY TO THE NATURAL NEVADAN PREDATORS WHILE HAVING CATTLE USUALLY WORKS TO THE PREDATORS DETRIMENT AND THEREBY DAMAGES THE WHOLE ECOLOGICAL BALANCE.
Wild horses and burros can be a plus to the area. Tourists won't come to see cows, but, horses and burros are another story. I have visited South Dakota because of Dalton Hyde's horse rescue. My husband and I would never have gone had it not been for that. We left a lot of money behind. Multiply that by horse and burro lovers and it could be a great money making program!
As you probably know 80% of Americans want our wild horses. In my opinion 15% has no idea whats going on and 5% want them eliminated for their own profit. Lets not break your promise to protect wild horses not to eliminate them.
BLM, PLEASE LEAVE WILD HORSES AND BURROWS ALONE. NO MORE ROUNDUPS. LET MS. PICKENS PUT HORSES AND BURROWS ON HER ECO-SANCTUARY.
5.) Suitable HMA for long-term management. Based on suitable habitat for horses (available forage even in dry years), size (winter and summer range with horses moving seasonally), water (abundant even in dry years) and lack of conflicts with urban areas (roads, residential area) the recommend HMA that should be manage for long term would include the Clan Alpine and Desatoya HA. Evaluate the Garfield flat HMA as to suitability for horses and consider removing horses and making it a burro HMA over the long term.
As a lover of nature and animals--and particularly equines--I urge you to protect the wild horses and burros from further horrifically cruel attempts to annihilate them.

Table C-12
Wild Horses and Burros

I hope the Carson City District Office takes into account ALL interests of we Americans, and not just local and commercial users of our public lands, when crafting the new Resource Management Plan (RMP) and all other land-use documents tiered to it. The BLM just won't be happy until every last wild horse is off our public lands and corralled in federal holding pens for the rest of their lives. You have the opportunity to stop the madness and create a sensible plan that allows for the presence of the these magnificent animals on our lands. They have very complex family structures that are built over the years, so to tear them apart is cruel beyond belief. Why are the ranchers so greedy that they refuse to share public lands with the horses and burros? Continued cruel and unnecessary roundups are NOT the answer. Time for a new, balanced and humane approach which I hope you will take. Please read below the sensible and cost-effective ways that can be used to keep our wild horses and burros on the land they call home.
I urge the Carson City District Office to consider the interests of all Americans, not just local and commercial users of our public lands, when crafting the new Resource Management Plan (RMP) and all other land-use documents tiered to it. The wild horses are our icons of the West and they deserve to live their lives free from the BLM. Yes birth control methods are in order, but not the inhumane rounding up of these magnificent animals. The new RMP must recommend options for increasing wild horse and burro appropriate management levels (AML), reinstating wild horses to zeroed-out herd areas (HA) and ensuring that wild horses and burros are afforded equitable distribution of resources within designated habitat areas. Why should Private Cattle raising businesses be allowed to use public lands, they are corporations. Public lands are for the wildlife not private business.
As a horse owner and rescuer I am appalled at the continued unnecessary round ups of our wild horses. This is not what Congress intended when it afforded protection for wild horses and burros. These horses belong to the American people. I urge the Carson City District Office to consider the interests of "we the people", Americans, that own these horses and not just local and commercial users of our public lands. The new RMP (Resource Management Plan) must recommend options for increasing wild horse and burro appropriate management levels (AML), reinstating wild horses to zeroed-out herd areas (HA) and ensuring that wild horses and burros are afforded equitable distribution of resources within designated habitat areas.
STOP! Before you wipe out these wild horses completely, they have every right to these HAs even more so since Congress granted them protection and the grazing rights. The BLM has seemed to forget it's responsibility to the wild mustangs and Burros, stop and think is your duty to cattleman and sheep herders? NO.....YOUR DUTY IS TO PROTECT THESE MAGNIFICENT AMERICAN ICONS!!!
I object to the helicopter roundups which maim and kill. These wild horses are part of our natural legacy and deserve better management than this. I believe the new policy should keep and maintain these animals in their wild historical habitats and ranges. That the cattle be reduced or removed entirely. That the horses are treated humanely. That any method of fertility control be based on sound science and that will allow the strongest and fittest to survive and thrive. Further, historic herds should not be separated nor culled. Mother Nature knows best and these animals have survived for generations without interference and done just fine. The laws of nature are the best method for ensuring their survival. We need to get back to the basics and not treat them as if they are a nuisance. We must be responsible stewards of our environment. I also concur with the below statement in its entirety. These folks - American Wild Horse Preservation Campaign - are in it for the horses, not for special interests. You should listen to them.
I do not live in your State but am asking to make a fair assessmet on land use. The Mustangs/Burros need this area to maintain their herds. Sterilization is a preferred course of action, instead of just eliminating them. Keeping this area available to them is a much better option to any holding facilities. I thank you for your time and interest and letting all of us make comments. Hoping the best interest for the Mustangs/Burros are considered.

Table C-12
Wild Horses and Burros

A whole new rational well-thought-out plan needs to be implemented. The most effective proven option now available is humane population control which should be immediately implemented which will accomplish the long range goal and reduce taxpayers' expense.
I am deeply disturbed by the lack of caring for the mustangs & burros and the lack of following the law that is displayed by the BLM in this matter. The BLM is nothing at this time, but water carriers for the greedy ranchers. This is not how the law was intended. It was to protect the mustangs & burros & the true meaning of the law must be reinstated. Ranchers do not own public lands or the wildlife therein & they should not have a major say in how the public lands & wildlife are treated.
Please start giving the horses a break. Public land shouldn't just be for cattle. All horses and wildlife should access to grazing and water. Quit saying it's the horses fault! Cattle outnumber horses at least 50-1! So it isn't just the horses! Stop with welfare ranching!
Please....just leave the wild horses and burros alone and at peace with their families!!!! Don't you think you have enough in long term holding to drain our tax dollars? I think they should all be released also. Save us a butch of money! Enough is enough! You'd think they were rabbits the way worry about their numbers. There is enough land and they are doing just fine with out your involvement.
The round-ups are animal abuse and need to stop immediately. Our wild horses are icon's and need to be protected not hunted down.
PLEASE PROTECT our PLANET BY PROTECTING ALL OUR animals!
There is plenty of land to accommodate these herds in a humane and equitable manner. We must stop, once and for all, the distribution of lands based solely on profits. The ecosystem needs these herds. America deserves these herds. They are a part of who we are. You must also make certain that these herds have adequate water supplies. Please remember, we are a PART OF, not THE, environment. We need to share, not devour the land. Thank you for your consideration.
The new RMP must recommend options for INCREASING wild horse and burro appropriate management levels (AML), REINSTATING wild horses to zeroed-out herd areas (HA) and MAKING SURE that wild horses and burros are afforded equitable distribution of resources within designated habitat areas.
Mustangs and burros have a right to have a piece of the earth and live life according to their nature just like the rest of us. They have families and they feel pain and stress just like the rest of us. To think otherwise is ignorant. I am vehemently opposed to actions that cause pain and stress to these beautiful animals. The only way to deal with animals of any kind is humanely. This has not been the BLM's track record in the past but it MUST be in the future!!! Surely there is room for these naturally evolved creatures to remain on the VAST deserts of Nevada.

Table C-12
Wild Horses and Burros

It just yet another sad reflection of the haves vs the have nots. . .the wealthy who want the BLM for private use will use whatever means possible to eliminate anything that gets in their way, regardless of the fact it is government land and the majority of the population have spoken out for years in defense of the wild horses and burros. They are icons of the American West and deserve to have protection and to run free not be rounded up and held in squalid holding pens.
We've traveled here for years, mostly to see wild horses. This zeroed-out policy is just ridiculous, a waste of money and abusive. It appears that 'money ' is being appeased. Does 'public' need to be redefined by dollars versus people so we know what we're really talking about?
I have been a travel professional specializing in introducing people from other countries to the great US West. Wild horses and burros are an important part of the picture for these visitors.
Please! You must not cave in the special interest groups such as ranchers who don't want to give up their cheap, subsidized grazing land. The land belongs to the American people and we have made it clear we want the horses to stay and less cattle destroying the land.
When plans are developed that only cater to ranchers and money, these plans are developed to only cater to a very small number of citizens of the USA. I oppose any similar rules that exclude the rights of wildlife in other parts of our country, not just the west and wild horses or burros.
Must we do to these majestic animals what we did to the American Indians? That is what it is looking like to many Americans.
The above makes me proud to read the above, for it is detailed, comprehensive, and while it will take hard work, it is the work that must and should be done to stop preference to cattle grazing and water use, and set mandated limits to cattle, and ensure that we preserve, honor, our horses and burros. Please do implement the above.
This is public land for wild animals. Not privately ownd domestic animals. Tell the cattle men to buy private land for their cattle and leave the public land for the wild animals.
Horses is the companion site to the PBS Nature special on Horses. The site introduction aptly explains the importance of 'Horses' in the following manner: "They have transported us, fed us, amused us, worked for us, fought battles for us. Their beauty, grace, and fiery spirit have inspired us. Many centuries ago, their speed and endurance altered human perceptions of distance, and permitted physical achievements that otherwise would have been impossible. To a degree unmatched by any other animal, the horse has profoundly influenced the course of civilization."
The creation of an up to date RMP for public lands managed by BLM's Carson City District office needs to provide for fair and equitable use of resources for our nation's wild horses and burros, including the land itself. The following is a list of items I feel should be addressed in any document regulating management of wild horses and burros.

Table C-12
Wild Horses and Burros

Wild Horse Data:
Documentation of Herd population count/census numbers which includes a complete demographic breakdown of Wild Horses in each of the Herd Management Areas

Number of Bands
Stallions/Mares ratios, which should be at a more natural ratio of 50/50
Foals
Yearling
3 Year Olds

Scientific data should be included and show the impacts of sex ratio skewing on the social/behavioral dynamics of the Wild Herds

Removal of fencing
These Wild Herds must be allowed to follow their natural grazing/migration patterns, to the degree possible. They also must be allowed to intermingle in order to maintain a viable and robust gene pool.

Predator protection
This is the natural way of population control, and these Public Lands/Herd Management Areas are, after all, wildlife areas, and should remain as such.

Prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PSP fertility control (if necessary) and protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues.

Also, OHV enthusiasts don't cause any more range degradation than the "Feral horses". I have seen many occasions of the destruction of this invasive species

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Thank you for the opportunity to add my thoughts and comments to the new Resource Management Plan for Carson City. I am a resident of California and have always loved the outdoors and wildlife, especially our Wild Horses and Burros. I value these Wild Herds and wish to see that they are given the protection and respect that they deserve.

I urge that a new RMP include the following tenets:

Table C-12
Wild Horses and Burros

Designate all HMAs to be managed principally for wild horse or burrow herds as allowed under 43 C.F.R 4710.3-2. If need be, decrease or eliminate livestock grazing, in HMAs pursuant to 43 C.F.R. 4710.5(a). A decrease in livestock grazing would preserve the BLM's multiple use mandate while also fulfilling the agency's mandate to preserve and protect wild horses and burros, as mandated by the Free Roaming Wild Horse and Burros Act, which is the law. I have nothing against cattle. I like them. These, however, are Wild Horse and Burro Herd Management Areas, and as such, Wild Horses and Burros should be prioritized, not blamed for the damages they do not cause. "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, and integral part of the natural system of the public lands"
"All management activities shall be at the minimal feasible level" Please start with an ACCURATE and CURRENT CENSUS, using the most up-to-date technology: 21,354: WH&B population as of 2/28/11 using BLM's own data & 20% growth model" (independent analysis)
Re-introduce wild horses to ALL of the zeroed-out Heard Areas (HAs)- where livestock grazing continues to be permitted. Since 1971, over 22 million acres of legally designated lands have been removed from America's Wild Horses and Burros. This legally designated land should be returned and re-established as Wild Horse and Burro habitat. Using BLM's figures of 240 acres to sustain 1 horse for 1 year, and 120 acres per burro per year, our public lands could sustain will over 200,000 Wild Horses and Burros. By allowing the natural functions of a true ecosystem to operate, including natural predation, the Wild Herds could then self-stabilize, and there could truly be a thriving ecological balance within Herd Management Areas.
Increase AMLs to accurately reflect range capacity for Wild Horses and Burros Stop the "zeroing out" of wild horse and/or burro herds. Range rotation, re-seeding temporary fencing, restoration/enhancement of water resources, and reduction of livestock grazing must be among the tools used to protect and restore any areas that do not meet habitat or rangeland standards. Congress defined "range" as: "... The amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros, which does not exceed their known territorial limits, and which is devoted to principally but not exclusively their welfare in keeping with the multiple-use concept for public lands;"
Implement an ON THE RANGE/RESERVE DESIGN Management program, for managing the present Wild Equine Herd population without removals, making forage/water adjustments, if necessary, as specified in CFR 43 C.F.R 4710.5(a). Reserve Design is the process of planning and creating a natural reserve in a way that effectively accomplishes the goal of the reserve. Successful reserves incorporate important ecological and social factors into their design. Such factors include the natural range of predators.

Table C-12
Wild Horses and Burros

Please do read Craig Downer's most recent book, WILD HORSE CONSPIRACY. He has solutions that should be seriously considered.

This is an excerpt from Craig's book courtesy of Canadian Horse Defence Coalition
Though restorers of the continent's ecosystem, they have been unfairly targeted for elimination. Over the centuries, they have borne our burdens and helped us along life's way-which makes it doubly unfair that they should be blamed for what we humans have done. As always, they stand ready to help us do the hard work now so desperately needed to restore our shared home.

Many of the author's personal experiences with these animals, their diverse herd areas, and the multicolored people involved with them are herein vividly shared. Urgently required now at the 40th anniversary of the Wild Free-Roaming Horses and Burros Act is a strategy to reverse the negative schemes that are causing their demise in the wild. As described, Reserve Design provides a way for establishing self-stabilizing populations through intelligent and caring programs executed with enthusiasm.

Wild Horses and Burros contribute richly to the natural ecosystem by virtue of their unique digestive systems. I quote Craig Downer, Wildlife Ecologist:

This includes increased soil building and increased humus from feces, leading to more nutrient-rich and water retentive soils, and to increased native seed dispersal from an increased variety of native plant species. Indeed, the wild equids are regenerators of the ecosystem, natural gardeners, and Johnny Appleseeds in their own right (See Downer, 2012).

We need our remaining wild lands to stay wild.
We need the natural predator species of wild animals in the wild.
We do not need BLM wild horse roundups or wild horses injected with chemical birth control. We do not need the gelding of wild stallions.

Table C-12
Wild Horses and Burros

Good range management should include:

RANGE MANAGEMENT/ DATA

All forage allocations (AUMs) within the Herd Management Area should be included in the range-management data.

Monitoring which distinguishes between Wild Horse impacts as compared to grazing livestock and other wildlife impacts on range resources.

Water usage should be clearly defined and FAIRLY allocated

Maps and analyses which clearly show impacts on Wild Horses and/or Wild Burros caused by any and all commercial usage of public lands within the HMAs.

Full disclosure of all cattle guards in the Herd Management area.
Any and all cattle guards should be either removed or fitted with Wild Horse Annie cattle guards which are specifically designed so as to be safe for Horses and Burros to cross.

Commercial usage of public lands should not receive the lions share of water resources. Wildlife, including wild horses and burros, should receive adequate allocations.

Fertility control:
At the present, there is no data that indicate that fertility control is necessary, as the present population is at or near a NON-VIABILITY level.

- 21,364: WH&B population as of 2/28/11 using BLM's own data & 20% growth model (independent analysis)

Compiled by Carla Bowers 10/26/11, Revised 11/6/11
For NAS/NRC Study Panel of BLM Wild Horse and Burro Program
All numbers above are verifiable

Fertility control should be used ONLY IF NEEDED. As such time deemed necessary One year, reversible, field dartable versions of PZP should be used

IF there is data showing justification for implementing fertility control, then the least intrusive methods for application of PZP fertility control should be implemented by using remote darting and water or bait trapping... Or both.

Table C-12
Wild Horses and Burros

Stallions should NOT be castrated. There is NO role for geldings in a Wild Herd.
Sex/ratio skewing

Scientific data to show the impacts of sex ratio skewing on the social/behavioral dynamics of the Wild Herds needs to be included and carefully considered.
Applied Animal Behavior Science
Immunocontraception decreases group fidelity in a feral horse population during the non-breeding season (see citation in list of references)

Contracepted mares both receive and initiate more instances of reproductive interest than do control mares. Reproductive behavior is energetically costly (Galimberti et al., 2000). Repeated bouts of male harassment have been shown to reduce total time foraging in equid species (Rubenstein. 1986; Sundaresan et al., 2007). The relative cost of such behaviors may be especially high during post-breeding season when resources are scarce (Stevens, 1990). In addition, the costs of this behavior may outweigh the potential benefits, i.e. increased reproductive success. Gestation in wild horses lasts approximately 11-12 months (Asa, 2002). Offspring conceived during the winter months are therefore subject to higher mortality due to the cold temperatures and poor quality forages available at birth.

5. Conclusion
In this study, mares contracepted with PZP behaved differently from control mares. They changed groups more often, visited more groups, and both exhibited and initiated more reproductive interest. These differences in behavior have the potential to adversely affect the stability not only of individual harems, but the entire population on Shackelford Banks, North Carolina. Additional study into the mechanism behind these behavioral differences and into the scheduling of PZP administration will help amellorate these effects.

I have read many of the studies done by those who have put years of research into understanding Wild Equine reproduction, herd behavior and herd dynamics. I have learned this much... WE NEED TO LEARN MORE. I've come to the conclusion that the best management is minimal management accompanied by continual and careful observation, as mandated by Federal Law.

Table C-12
Wild Horses and Burros

Wild Burros

It is imperative that Wild Burros be included in this RMP and Nevada is fortunate to have them. They should be treasured and protected.

This species is endangered and clearly listed as endangered where found. The Endangered Species Act does not make any reference to exclude species that may or may not be found on other than a historical country or area- this this includes the United States of America and the State of Nevada.

The following link is published by the U.S. Fish and Wildlife Service species profile:
http://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=A00M

Kingdom: Animalia
Class: Mammalia
Order: Perissodactyla
Family: Equidae
Listing Status: ENDANGERED
Where Listed: WHEREVER FOUND

The BLM has been given the responsibility to protect the Public's Wild Horses and Burros on public lands as mandated by the Free Roaming Wild Horses and Burros Act of 1971. That is the Law. This is the beginning of a new century. As we move forward, we must save that which cannot be replaced. We can and must learn so much from these Wild Herds. I have been around Horses most of my life, but I never had the opportunity to see how they interact when in their own surroundings, without the interference of Man. There was SO MUCH that I never knew. There is so much more to learn... how they work with their Families... how the Lead Mare often runs the show... how the Band Stallion earns his right to be a leader and reproduce. He has to PROVE his worth and earn his place in the genetic lineage of Wild Horses.

I'll leave you with this information from Karen Suesman, president of ISPMB (INTERNATIONAL SOCIETY FOR THE PROTECTION OF MUSTANGS AND BURROS). This is one of the oldest and most respected Wild Horse and Burro organizations in the country. It was founded in 1960.

The current removal methods have destroyed the horses' social structure, which have resulted in a severe lack of modeling to younger horses by the older and wiser horses. This has happened by younger and younger stallions taking over harem bands. The best analogy is that the Harvard professors are no longer in charge of harems which have given way to younger stallions,who are the equivalent of grde school children.

We also believe that the future of the herds on public land is at great risk for survival over the long term because of the breakdown in their educational system though the destruction of their social harems.

Table C-12
Wild Horses and Burros

And then there is this article, done by a man who, upon his first glimpse of Wild Horses in Nevada said this:
http://www.hoofrehab.com/wild_horses.htm

After all these years, my family and I made our first trip to see the wild horses of the United States...
So, I walked into wild horse country thinking that I was on a tourist trip; confirming what I already knew. I could not have been more blind. I could not have been more wrong. They were much, much more than I had ever imagined. What I write here, will probably sound very similar to what my predecessors have written. I don't know if anyone's words can get the point across to the world, but I have to try. I thought I was ready, but what I saw literally blew me away. I have worked on thousands of horses, all over the world. I spent six years of my life in the saddle from daylight till dark. I've had the privilege of working on some of the finest horses, for the finest horsemen in the world.

Understand that after two minutes with the wild ones, I knew that I had never seen a true horse. I literally had no idea of their potential.

The country was solid rock; mostly baseball-sized porous, volcanic rock that you could literally use as a rasp to work a hoof if you wanted to. Every foot or so, a basketball sized rock was thrown in for good measure....

How has the world ignored the remarkable lessons the natural horse has to offer us? Only a few people have noticed them and very little time has been spent studying them.

The true wild horse is an endangered species, because true wild horse country is almost gone. We had better learn to treat them as such and get all of the answers we can from them before it's too late.

Do no kill any more wild horses!!!

Period!!!

Use contraceptives instead.

I feel that there is too much removal of our wild horses. Livestock owners should keep their livestock on their private land. This would solve a lot of problems.

Table C-12
Wild Horses and Burros

We encourage the Wild Horse Management program to manage populations within the Appropriate Management Level (AML) to meet a "thriving natural ecological balance" as is described in the 1971 Wild Horse and Burro Acts and is provided for in further BLM policy and guidance. We encourage the CCD to make a strong commitment in the RMP to adequately monitor wild horse and burro body score conditions, population numbers, rangeland forage conditions, and riparian and spring conditions among other monitoring procedures, basing management decisions on monitoring data. As monitoring data indicates, timely gathers should be conducted to remove excess animals including all animals outside of HMA boundaries. Additionally, NDOW supports BLM's effort to utilize the full range of management tools at their disposal to ensure that horse and burro numbers are maintained in balance with other resources such as wildlife. These tools include but are not limited to the use of removal gathers, sex ratio skewing, fertility control, chemical or surgical sterilization, adoption, non-reproducing herds, etc. We request that a strong commitment towards monitoring occur, supported by timely management actions that addresses management issues. For example, if wild horse numbers are within AML and rangeland resource impacts (e.g. spring monitoring) are occurring by wild horses as indicated through rangeland monitoring efforts, we encourage adjusting AML as necessary to meet a "thriving natural ecological balance" and immediately removing excess horses to the adjusted AML so that resource impacts are minimized. Furthermore, we encourage taking appropriate actions (e.g. re-seeding, excluding animals from an area, etc.) to repair resource damage.
The Augusta HMA appears to have an AML above a thriving natural ecological balance as we have observed impacts to rangeland resources. We request that the CCD consider adjusting AML appropriately within this HMA through the RMP process. It is our understanding that this area is managed jointly by the Battle Mountain, Winnemucca, and Carson Districts. We encourage all three districts to jointly monitor and manage this HMA in a thriving natural ecological balance.
Fire Prevention Wild Horses and Burros should be partnered with Smokey Bear when it comes to wildfire prevention on public lands. Here, again, I quote Craig Downer, who has made a lifetime study of these wonderful animals: Their post-gastric digestive system is better able to handle dry, coarse vegetation and to process this without over-expending metabolic energy and to leave less degraded humus to enrich and build the soils, and make them more water-retentive (in relation to ruminant grazers, i.e. the rest). The broad-roaming habit of wild horses and burros also lends itself to their role as preventers of catastrophic fires. Also, they disperse more viable seeds of a greater variety of species in their ample movements over their large home ranges. All this and more makes them fire-preventers or minimizers par excellence!
Base AMLs on scientific and rational principles that provide adequate herd size for genetic viability. Increase AML to the 150 adult animal minimum to ensure that genetic variability is not jeopardized.
I urge that the beautiful wild horse be given the open space they deserve. I'm from California and when we travel around the Virginia City, Carson City and Reno areas, it is such a thrill to see the awesome wild horses on the hills or in the Virginia City Highlands. You have no idea what a joy these animals bring to us, thinking of how they have survived all these years basically on their own and just by their being, add grace and beauty to the landscape!
My family and I enjoy viewing wild horses AND BURROS when we go to Nevada! So do other people. You can't just get rid of them. Your job is to ENSURE A FUTURE for these historic/ iconic animals on the range.

Table C-12
Wild Horses and Burros

Horses, burros and other wildlife must have water, you can not take that away from the animals that have federal protection to it. It is a necessity for life and 80% of Americans want our wild horses protected from the commercial users (cattle ranchers). They are illegally stealing and killing the wildlife for their greedy industry. These are Americans??? They are thugs.
STOP KILLING OUR WILD HORSES BECAUSE YOU CAN NOT STAND UP TO THE CATTLE RANCHERS.
THESE HORSES HAVE BEEN THERE LONG BEFORE ANY OF YOU DECISION MAKERS OR MONEYHUNGRY RANCHERS. FOR ONCE, DO THE RIGHT THING. MAKE A DECISION YOU CAN HONESTLY LIVE WITH AND NOT ONE THAT WILL HAUNT YOU.
It saddens me the way BLM mistreats America's wild horses and burros. Why haven't they jumped at Madelaine Pickens' offer to send the imprisoned horses to her eco horse sanctuary? Why are you so eager to please the cattle ranchers?
The BLM must stop favoring the cattlemen, removing wild horses and replacing with cattle, appears to be Illegal. The American public has a right to expect fairness on our public land. I would hope a Government Agency would want the respect of all Americans, not a special few, with deep pockets.
As an important Government agency the BLM should be interested in fairness to the American public. The BLM should Increase wild horse and burros herd management levels, if fairness is considered. Using up to date scientific methods. The herds must have enough horses to keep genetic viability. The BLM should fulfill there obligation to manage the wild horses and burros on public land. Public land Is for multiple use. Cattle are overrunning our public land. This Is not what the ROAM ACT of 1971 mandated.
The six zeroed out HA'S ,should be restored to the wild horses and burros. I do not believe the BLM had the right to to zero out any wild horse and burro herds. I am told cattle now roam this range. If I am wrong please, advise me?
PZP and other reversible methods should be used to control populations. The horrific helicopter roundups should be stopped. Native American cowboys could be used to roundup wild horses and burros when, necessary. This would also create employment for a group of people that need jobs. The helicopter companies have reaped millions from tax payers. Lets give native American cowboys a chance. The BLM has failed to manage the horses on the range. The solution would be to involve the public with management. I have read numerous EA reports none have addressed the Impact of cattle grazing on the range. The wild horses and burros need to receive there fair share of water . If ranchers are unwilling to share water , the BLM has the right to revoke their grazing permits.
All HMA's are suitable for management. Under authority given in the ACt of 1971 the Secretary set up sanctuaries (or Herd Areas). The land base and resources have been taken from the protected American Heritage Species and utilized for other interests. The impetus at this juncture needs to be on the management of wild horses and burros on their entitled land as a prioritized use.
Designate all HMAs to be managed principally for wild horse or burro herds as allowed under 43 C.F.R. 4710.3-2. Decrease or eliminate livestock grazing in HMAs pursuant to 43 C.F.R. 4710.5(a). A decrease in livestock grazing would preserve the BLM's multiple use mandate while also fulfilling the agency's mandate to preserve and protect wild horses and burros.

Table C-12
Wild Horses and Burros

The expectation is that the Environmental Assessment associated with the proposed revision will adequately document the risks to the HMA's occupied by our protected wild horses from the extractive industry coming into these ranges. Any permit that adversely effects the areas occupied by wild horses and burros must effectively replace, repair, restore and all damages, encroachments or loss of surface use. If those projects can not effectively do so they must be denied.
Replace outdated and costly wild horse management that relies on mass roundups and removals with a cost-effective and science-based approach to managing wild horses and burros on the range. When necessary to suppress population growth, implement reversible, non-hormonal fertility control. such as PZP, and other methods that do not compromise or inhibit the natural wild behaviors that the agency is mandated to protect.
Allocate resources equitably. Livestock and other commercial usages should not be allocated more resources than, or given preference over, wild horses and burros in designated herd management areas. The BLM has a mandate to protect wild horses, while livestock grazing occurs at the discretion of the Secretary of the Interior. Therefore, the agency must prioritize wild horse and burros on the small amount of BLM lands still designated as habitat for these animals.
Stop the "zeroing out" of wild horse and/or burro herds. Range rotation, re-seeding temporary fencing, restoration/enhancement of water resources, and reduction of livestock grazing must be among the tools used to protect and restore any areas that do not meet habitat or rangeland standards. Reintroduce wild horses to the zeroed-out Tule Ridge/Mahogany Flat, Pah Rah Mountains, Horse Spring, southern portion of the Pine Nut Mountains Herd Areas (HAs) - where livestock grazing continues to be permitted. Private ranchers should not profit and benefit from their unwillingness to allow wild horses to remain in these HAs - therefore all livestock grazing should cease if wild horses are not permitted in these areas.
Prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PZP fertility control (if necessary) and protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues.
The vast majority of users of public land have considerable resource available to their use. Wild Horses and burros are restricted to the boundary lines that, in many cases, were inaccurately drawn. This finite, and flawed, space is vital to the survival of this American Heritage species as intended by Congressional law. Within these boundary lines horses and burros are to be considered a principle, but not exclusive, use. Currently they are not managed as such. This mandated use is the lowest of priority. To perpetuate a use of public land the viability of that use must be first priority. Populations must be managed to perpetuate the species with a minimal level of interference. Populations capable of breeding to sustain genetic viability, without interference, must be maintained before other uses are allowed.
Numbers within the boundaries of HMA's should all be given a minimum management level of 150 individuals that are of reproductive age. If current boundary lines do not allow for that viability standard, the authority to change those lines currently exists and must be reviewed. If areas are too small to accommodate the viable population then HA land bordering the HMA can be added. If areas are too small to support a viable population then the real possibility that the lines were flawed must be taken into account and corrected.

Table C-12
Wild Horses and Burros

The language in the standing RMP (quoted below) must be enforced with the recognition that this language applies to all permitted activity including extractive industry. "Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly."
Please recognize that the vast majority of the public is unaware of the decision making process on public land. There is an assumption that horses exist protected and viable due to an act of Congress. A greater effort needs to be made to educate the public to the multitude of projects that have potential impact. The damages to wild horses are not being appropriately mitigated without public participation, yet the public remains uneducated to the process.
The impacts to sex ratio skewing are not fully understood. Until further data is available that clearly demonstrates a population control impact without adverse effect to herd behavior it should be suspended. PZP should only be utilized within the confines of known seasonal effectiveness. Under no circumstances should surgical sterilization of mares be employed as the risk of infection and death is too great. Currently surgical sterilization of stallions should not be employed until impact to the behavioral structure on the range has be adequately documented.
This is the stage of the land use planning process where public comments can make a real difference in shaping the final land use policy that will affect wild horses and burros for the next 10-20 years.We demand fairer and more humane treatment for Nevada's wild horses and burros! This is the stage of the planning process when the BLM sets management strategies, allocates resources, and sets "appropriate" management levels for wild horses and burros. Now is the time to raise our collective voices to demand change for the wild horses and burros in the heart of mustang country!
I urge the Carson City District Office to consider the interests of all Americans, not just local and commercial users of our public lands, when crafting the new Resource Management Plan (RMP) and all other land-use documents tiered to it. The new RMP must recommend options for increasing wild horse and burro appropriate management levels (AML), reinstating wild horses to zeroed-out herd areas (HA) and ensuring that wild horses and burros are afforded equitable distribution of resources within designated habitat areas.
Where are habitat improvement projects appropriate? Horses relying (obviously through no fault of their own…-they can't help discovering and utilizing water sources!) on rancher water improvements should not suddenly lose access to the water when the cows are sent to market. Water should be left on as partial "payment" for grazing on public land. However, water - and maybe even mineral baiting - might be useful tools to use for the purpose of relocating herds without the need for a gather.
A great deal of thought should be given before skewing sex ratios to favor stallions. When breeding-age mares become scarce, there is the potential for inappropriate or violent breeding of the most available - the very young and the very old. Fillies experiencing first estrus are physically immature; pregnancy or foaling could pose a fatal risk for both mare and infant. A too-young mare may lack the calm, mature mind necessary to care for an infant, also with tragic results; the flight response to perceived danger in young horses is very strong. Older mares may, likewise, be unable to carry a foal to term or survive the rigors of pregnancy or delivery. Infanticide - a rare occurrence in wild horse herds - may become more prevalent along with aggressive stallions manipulating pregnant mares to spontaneously abort.

Table C-12
Wild Horses and Burros

Water source development or augmentation should take place wherever wild horses and other wildlife occur; all will benefit from these improvements. Many EAs have anecdotal information outlining wild horses chasing other wildlife from a pond or stream, but these stories fail to indicate the deer that chase off the pronghorn, or the pronghorn that chase off the jackrabbit. Nearly every living thing in the desert will dominate a smaller entity - the horse being larger than the deer, the deer being larger than the pronghorn. It's a natural occurrence. If a spring or trough is developed, all will benefit. If water sources become scarce or unavailable, perhaps some thought should be given to supplemental watering. None of the animals on the range should be made to suffer for the conditions of the ranges they have chosen - or were forced - to live on.

As a supporter of wild horses, I'd like to take this opportunity to offer my appreciation to the CCD – in encouraging community involvement and interaction in decisions and policies; for being available in communications, either by telephone or email, and unfailing courtesy in those communications; and finally, for the attention to detail in Environmental Assessments involving wild horse removals. Not necessarily for 'purpose and need', but for the recognition given the horses themselves in the EAs. There is no recrimination nor blame leveled at the animals. There are facts presented. And this attention goes beyond the gathers, demonstrated by agents who follow-up and follow-through once the animals have been removed. This office may not always get positive recognition, but it's efforts are still appreciated.

Should HMA boundaries be adjusted, combined and/or eliminated?

At a minimum, HMA boundaries should be adjusted and combined in order to create contiguous Wild Horse habitat areas. The fact that HAs were based on locations where horses existed in 1971, but then pared down for human management convenience, demonstrates that horses have "lost ground" from the start. Grazing should be eliminated from HA/HMA areas to reduce the conflicts between ranchers / livestock and wild horses. In my opinion, it was a mistake to allow permittee grazing in HAs - a public relations problem that has worsened the situation.

What criteria should be used to make habitat and population suitability and viability determinations?
Wild Horses risk losing genetic viability when their numbers fall too low (already happening). Population groups should consist of about 200 animals, not some of the ridiculously low AML numbers that exist in certain areas. Obviously to sustain 200 or so animals, HMAs need to be large (tying in with question one, about adjusting and combining). This will spread the use across a larger area, better protecting the resource.

What methods, other than removal through gathers, should be considered to achieve AMLs?

First AMLs need to be scientific, and not arbitrary 30-40 year old numbers. Second, when BLM monitoring does not detect range degradation, there should not be gathers -regardless of AML.

The 2010 Calico gather is a good example - while Bob Abbey on one hand was justifying the (public relations disaster) gather by saying things like: "The fact is right now we have three to five times the population of wild horses that the range can sustain," BLM field monitoring agent Glenna Eckle was discovering: "I assumed that we were close to those population estimates of being under AML, and so the monitoring data was meeting management objectives that we had identified. And again, I was thinking we had a smaller population" (Testimony)

Table C-12
Wild Horses and Burros

....monitoring data was meeting management objectives....

In other words, the whole fiasco (winter gather, miscarriages, foals sloughing hooves, high death count) was unnecessary. The range wasn't suffering, and the horses were in good condition. They should have been left alone.

Adding to poor public opinion of this gather were comments like this: "A goal of the roundup, acknowledged Heather Emmons, a spokeswoman for the agency, was providing access to grazing land for cattle." (New York Times)

Third - BLM needs to adjust its view about what exactly it is managing. Horses are PRINCIPAL users of their land yet they always seem to be considered last - "troublesome, an inconvenience, a pain in the neck" - instead of "the reason many of the BLM staff have jobs".

Lastly - BLM frontline staff needs to know that wild horses don't just survive, they thrive on
poor forage. As hindgut / cecal digesters, they are made for the desert habitat. Staff members should not be viewing these horses and burros through the lens of domestication- there's no need to feel sorry for them as they eat brush instead of alfalfa (as was mentioned to me at a recent gather) - their low quality diet encourages wandering and grazing, vs standing in one lush spot gorging on green grass.

How should BLM address wild horse and burro urban-interface issues?
No one wants to see animals (or people!) injured or killed, and cases of overlap are good examples of when BLM *should* step in and do either a nuisance gather if it's a few animals, or a regular gather if a whole band or herd is in constant conflict with a human border. These animals don't have to go to holding though; there is plenty of room to release them in closed HA / HMA areas. They can go in intact families (and even receive birth control) and only have to be held a short time for transport and release.

Slightly off topic, but in 2009 at the SRM conference on Wild Horse and Burro Management, I passed a proposal and financial calculations to BLM members in attendance, that showed turning non-breeding / single sex herds back out from longterm holding would save millions of dollars almost instantly - freeing up money to be used on contraception and range monitoring, etc. I wish that BLM would take this kind of action, instead of continually asking for more money to warehouse horses.

Please consider what is good in the long term for the horses and burros; not just the immediate use or for only those in these areas. It should be about more then ranchers and the fees you can make off of them using the land, so moving the horses and burros from it.

What age structure and sex ratios are appropriate to ensure healthy future herds of wild horses and burros?

The best age and sex ratios are those designed by nature. Skewing the M /F ratio is useless, since technically only 1 stud is needed to keep a large number of mares in foal. Altering age and sex (by taking babies and returning a higher percentage of males) changes herd dynamics, robs them of their collective knowledge (elder "wisdom" and so on) and adds more stress to animals already being closed in on from all sides. The whole reason they are as strong and hearty as they are is through natural survival of the fittest. Rotating birth control "catch and release" programs might be a good compromise between gathers and no management. At least the herds stay together and maintain their social relationships, even if they're "baby free" for a couple / few years.

Table C-12
Wild Horses and Burros

Since the construction of USA Parkway and the expansion of human encroachment into nearly every corner of the district - even the most remote or desolate - it stands to reason there will be more contact between wild horses and humans. Perhaps an increase in reflective silhouette signage along the more heavily used highways where wild horses tend to roam, and lighted 'crosswalks' on portions of highways known to be used by wild horses. Some form of media to educate and alert the public to the presence of wild horses along a particular route. Encourage the public to utilize plants in their landscapes which are both unappetizing to wild horses and desert-friendly. This could be a two-fold solution as water is a precious commodity – especially in outlying areas. And more emphasis should be placed on discouraging the public from leaving forage - specifically hay - for wild horses. This is dangerous for both people AND wild horses.

Where are habitat improvement projects appropriate?

Horses relying (obviously through no fault of their own…-they can't help discovering and utilizing water sources!) on rancher water improvements should not suddenly lose access to the water when the cows are sent to market. Water should be left on as partial "payment" for grazing on public land. However, water - and maybe even mineral baiting - might be useful tools to use for the purpose of relocating herds without the need for a gather.

What kinds of improvement projects are feasible?
Road barriers, escape ramps, passage "corridors" for animals caught in checker-board type areas, and water improvements - capping springs, etc., *as long as the methods are reliable and won't leave animals without water for a long period of time because no one checked the pump or trough!*

When is it appropriate to develop or augment water for horses and burros?

Water development is appropriate when it is used to direct the location of the herds, to move them around an HMA, or away from a populated area, etc. Obviously, care should be taken not to add large numbers of water sources that would encourage population spikes. Water is a legitimate limiting factor in the desert, but should not be allocated based on politics, etc. No animals respect arbitrary human lines and rules - water should be available where it is " or in reasonable proximity" for all animals to utilize.

Any other issues or concerns with the management of wild horses or burros?

There's a lot of water under the bridge, in terms of bad feelings between "the public" and BLM / Wild Horse staff, and unfortunately many interactions are now strained. The perception of secrecy and deception is a big black eye for the agency. It seems to be a combination of stubbornness, lack of communication from frontline staff with "boots on the ground" and policy makers, lack of current science, and the perception of BLM being "in bed with the cattle lobby" when it comes to horse issues. The makeup of new citizen panel is a timely example.

Regardless of who is at "fault" in the troubled communications that now exist (public or BLM) it's BLM's paid job to fix it, and handle whatever issues arise related to management of the horses. Collaboration would go a lot farther than the current model of confrontation and damage control. (Example: how can the public trust that the BLM is trying to change when the citizen panel doesn't accurately represent the citizens...)

7. Wild horses: The ranches use to take care of the wildhorse problem of overpopulation to the benefit of controlling the quality of those bands. Now, since the government has taken over it is an unreasonale expense to the taxpayer. Yet, the problem still grows out of control.

Table C-12
Wild Horses and Burros

Please take into consideration the concerns of Americans everywhere who are interested in preserving the mustang herds of the west when you are setting new management strategies, resource allocations and management levels.

I would encourage you to consider using non-permantent, safe methods of birth control instead of dangerous round-ups and subsequent storage in the BLM pens of so many unfortunate horses and burros. The herds should be large enough to allow for variation in the gene pool.

Perhaps private groups could be encouraged to assist with time and/or funds to promote adoption, training, and education for those who might be interested in purchasing one of these wonderful animals, or those living in a surburban area encroaching into mustang territory.

Thank you for your consideration in providing a better system of herd management for these American icons.

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2) The same type of program should also be set up for Springs and other sensitive riparian areas. Many springs/riparian areas are being hammered by horses and livestock in the CCDO jurisdiction. A program should have been set up and fully implemented years ago for this.

There was never any need for the masacre of the mustangs, politician, cattlemen, all found that paying for what they wanted, grazing rights for their cows, a leg up in a political career, whatever the excuse or justification for their murder , it is still that: an excuse.

Which HMAs are suitable for the long-term management of wild horses and burros?

ALL HAs/HMAs should be considered suitable (possible exceptions being human interface problems) because that's where the horses were originally found. Again, BLM needs to adjust its view - what's "treacherous" for wranglers and helicopters is home turf to Wild Horses.

"The roundup will give wranglers ample time to corral the large numbers and provide the best access to the horses, before they migrate to more treacherous terrain in the warmer months, Mr. Abbey said." (New York Times)

From the BLM / Calico web site: "Winter gathers in this area are preferred as foals are older (obviously this was not the case for Calico) and wild horses are located at lower elevations, reducing the travel distance to the trap site. Oftentimes, wild horses are located at the highest elevations during the summer months, and therefore, would have to travel over steep terrain to the trap sites."

If the horses were only accessible during the winter, and in treacherous terrain during the warmer months, then the need to gather them is all the more questionable. Livestock don't utilize this steep terrain, so there's little chance of conflict and overgrazing.

Any HA / HMA should be considered useable, because horses were already living there. As we're all aware, their lack of understanding of maps and boundaries causes many problems, and the larger, contiguous, and more remote areas are, the less likely the horses are to inadvertently "trespass" into unauthorized land.

Every time I see a feral horse, yes feral there are very few mustangs, I see approximately 10 dead deer standing in it's hoof prints. These animals are a menace to our lands and contribute almost zero to the local economy when compared to hunting. They need to be rounded up and disposed of not kept in pens costing us millions of dollars why we wait for habitat restoration. This animal is a herbivore and should be considered for a general hunting season.

Table C-12
Wild Horses and Burros

7.) Habitat improvement project. Horses and burros have a tendency to impact riparian areas, such as spring, meadows and streams in certain location. These areas are typically very important areas to wildlife and for livestock grazing. The CCDO should evaluate these areas to determine if horses/burros should be excluded with horse proof fencing. The CCDO consider using exclusion fencing on some of the important spring sources in the Desatoya and Clan Alpine Mountains, including areas in the WSA's. In some of the HMA, pinyon-juniper tree cover is reducing potential forage. Possible improvement project to increase forage production would include PJ removal and in some location crested wheatgrass seedings. Also installing seedings could be used to change the distribution of animals, and could be used as a possible way to keep animals out of urban interface. In the Pine Nut Mountains there are several old seedings (Sunrise Pass) area that are in need of some brush removal. With some brush removal forage production could be increased. Would recommend looking at additional tree removal projects in the Pine Nut Mountains to open more habitats.

8.) When to develop water for horses and burros. Any new water development for horses/burros should be done for the purpose of improving/changing/ rotating the distribution of animals, or for the protection of the water source. Nevada BLM needs to continue to work with the Nevada State Water Engineer to get approval for water rights for wild horses and burros.
If there are exiting water sources in the HMA and horses/burros have impacted these sources, then the BLM should design and install spring exclosures and water developments that can withstand horse/burro use. If there is exiting water sources with water rights, and horses/burros are using these sources, or have impacted them, then the BLM should work with holder of the water right and the State of Nevada to help develop and protect these water sources. If water is limited in the HMA, but there is opportunity to use it to trap horses, then the CCDO should work with water right holders to develop/improve water sources and include temporary or permanent fencing at the sources for future water trapping. If no water is available in the HMA, then AML should be set to 0.

9.) Other issues concerns
AML's. All in all, based on my knowledge and experience, AML numbers set in most of HMA's over allocated forage to horses. The reason I give for this is that:

1.) BLM uses 1 AUM (900 lbs air dry wt forage) per 1 horse. Most data references an adult horse (non lactating) as 1.25 AUMs. Even though the BLM consider each horse (regardless of age, i.e. foal, yearling, etc) as a 1 AUM, I think that adult horses far outnumbered young horses in most herds.

2.) The formula using utilization mapping and census number is extremely rough in getting to a good carrying capacity number. It was a good start, but it is time to get to a more accurate number. This could be accomplished by doing several years of forage production inventory in key areas, or locations of critical resources.

I am writing to you as an advocte for the wild horses and burros that will be effected by the new revisions in the Carson City District RMP. The wild horses and burros share the land with multiple users, but their needs to survive are not a priority at this time, and this must be addressed and changed NOW!! I am a tax payer, and my taxes contribute to the BLM budget for herd management, and I want to see more research completed, so we can confirm what they need to sustain themselves, and see action taken to ensure that happens!
The vast majority of users of public land have considerable resource available to their use. Wild Horses and burros are restricted to the boundary lines that, in many cases, were inaccurately drawn. This finite, and flawed, space is vital to the survival of this American Heritage species as intended by Congressional law. Within these boundary lines horses and burros are to be considered a principle, but not exclusive, use. Currently they are not managed as such. This mandated use is the lowest of priority.

Table C-12
Wild Horses and Burros

To perpetuate a use of public land the viability of that use must be first priority. Populations must be managed to perpetuate the species with a minimal level of interference. Populations capable of breeding to sustain genetic viability, without interference, must be maintained before other uses are allowed. Numbers within the boundaries of HMA's should all be given a minimum management level of 150 individuals that are of reproductive age. If current boundary lines do not allow for that viability standard, the authority to change those lines currently exists and must be reviewed. If areas are too small to accommodate the viable population then HA land bordering the HMA can be added. If areas are too small to support a viable population then the real possibility that the lines were flawed must be taken into account and corrected. Public/private cooperatives must adhere to all standards as any contractual agreement and must be made available for public comment and competitive bid. Any public cooperative that requires removal, handling or range repair (springs, fencing) must be reviewed carefully against any standard of conflict of interest. No allotment permittee for livestock grazing should hold any permit to remove wild horses from any public land, EVER!!
The language in the standing RMP (quoted below) must be enforced with the recognition that this language applies to all permitted activity including extractive industry. "Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly." Please recognize that the vast majority of the public is unaware of the decision making process on public land. There is an assumption that horses exist protected and viable due to an act of Congress. A greater effort needs to be made to educate the public to the multitude of projects that have potential impact. The damages to wild horses are not being appropriately mitigated without public participation, yet the public remains uneducated to the process.
The impacts to sex ratio skewing are not fully understood. Until further data is available that clearly demonstrates a population control impact without adverse effect to herd behavior it should be suspended. PZP should only be utilized within the confines of known seasonal effectiveness. Under no circumstances should surgical sterilization of mares be employed as the risk of infection and death is too great. Currently surgical sterilization of stallions should not be employed until impact to the behavioral structure on the range has be adequately documented. Again, the BLM does not use enough of its budget on research, but instead plunges in with management plans based in inaccurate and/or unconfirmed data, putting the future of our herds at risk.
The expectation is that the Environmental Assessment associated with the proposed revision will adequately document the risks to the HMA's occupied by our protected wild horses from the extractive industry coming into these ranges. Any permit that adversely effects the areas occupied by wild horses and burros must effectively replace, repair, restore and all damages, encroachments or loss of surface use. If those projects can not effectively do so they must be denied
All HMA's are suitable for management. Under authority given in the ACt of 1971 the Secretary set up sanctuaries (or Herd Areas). The land base and resources have been taken from the protected American Heritage Species and utilized for other interests. The impetus at this juncture needs to be on the management of wild horses and burros on their entitled land as a prioritized use.
Healthy herds are not only determined by the strongest and most attractive but also by an intelligent and sensible nature. A natural balance of elderly animals provides a stability to the herds and bands - and may be an under-utilized resource in limiting population growth. Many older stallions - past the point of being able to defend a harem - instead become lieutenants or leaders of bachelor bands. Older mares are not the first choice for breeding in a family unit, although it isn't unheard of. But both older stallions and mares are rich sources of range knowledge and anchors of stable social behavior. Their lives are limited, but their contributions to maintenance of healthy herds is essential.

Table C-12
Wild Horses and Burros

I am a U K resident who visited Nevada last year I visited some of the herd areas just to see the wild horses & burros. I have read articles in the press about your ideas on the new (RMP). I would ask you to demand a change for the horses and burros in the heart of mustang country,our world is changing by the hour,please think about my comments.
It's difficult to recommend which HMAs are better suited to long term management of wild horses; the concern is which HMAs would be eliminated for being too small, inconsequential or difficult to maintain. Conditions in HMAs within the district are contingent on precipitation and Nevada is notorious for it's unpredictable weather. Logically, larger HMAs are capable of larger populations, but some smaller HMAs, like Granite Peak and Dogskin Mountain, are lush nearly year-round, specifically due to the vegetation and hidden water sources. Wild horses within the CCD have adapted to their ranges - some herds thrive on poor quality or sparse quantities of forage. And location - to limit negative human-horse interaction - might also have to be taken into consideration. Expansion of smaller HMAs into the nearest larger HMA might be the preferred solution.
I follow our local wild horse bands, documenting them in my photographs to share with the world. They are Nevada's true treasure and should be given priority in range management planning.
We should promote tourism of wild horses and burros, as the gambling industry continues to decline in Nevada.
We also note the round-up and removal of our great American families of wild horses and burro's. We used to be able to go out into these wilderness areas and see dozens of bands of Wild Mustangs and Burro's. Now, if we are lucky, we might see an old stag that is too lame to run from us.
I am a registered voter in the state of Nevada. I am deeply concerned about the bias shown to proprietors and private interests versus the wildlife and public interests when it comes to the management of our public land. Wild horses and burros should not be removed only to make way for the land to be leased for cattle grazing or mining. It completely discredits the claim that there is not enough food or water.
Here are my responses to your some of your comment solicitations: -I do not believe that the HMA boundaries should be adjusted at this point in time. Resources should be conserved because of the current economic crisis. None of Nevada’s valuable resources should be spent making unnecessary changes but rather every effort should be made to reduce costs. -If necessary, wild horse experts such as Laura Leigh should be consulted to determine habitat and population suitability and viability. -Methods other than gathers that could be considered include bait trapping and contraceptive darting. -Urban-interface issues could also be addressed though bait trapping and fencing. -There is plenty of land for the horses. -Herds should have 10-14 members with 1 male per herd. -Habitat improvement includes removal of hazards prior to roundup. -Harvest rain to conserve water and supplement the natural occurring source that are depleted by the drought. This will benefit all species.

Table C-12
Wild Horses and Burros

In closing, here is my major concern with the management of wild horses and burros: The 1971 ROAM Act was intended that helicopters and other motorized vehicles would not be used in the capture of wild horses and burros. It is cruel to round them up with helicopters -especially in the heat of the summer. Please discontinue any plans for summer roundups. Your organization may soon be held to the same standards as the rest of America in regards to humane treatment of animals as it should be. About the horses in the holding pens and waiting to go to the sanctuary, please focus your efforts and resources on making life better for the horses that are already captured instead of capturing more
Perhaps adjustments (expansion) to HMA boundaries or incorporation with larger HMAs would be more practical. Four of the HMAs under the CCD's purview are very small - the Lahontan, South Stillwater, Dogskin Mountain and Granite Peak. By aspect of their size, exceeding AML is a virtual guarantee in a very short period of time. Because of their locations and concurrence with the next larger HMA, expansion would be preferable. In the Lahontan, for instance, there is no water source; the horses here must leave the boundaries to drink, leaving them vulnerable to being 'outside the HMA' and subject to removal. Could it be pragmatic for the Planning District to expand the boundaries - to perhaps include the Lahontan in the Horse Mountain HMA? To attach Dogskin Mountain and Granite Peak? Or South Stillwater to Clan Alpine? There may already exist co-mingling of these areas; wild equines shouldn't be penalized for following their nature in roaming for food, water or the acquisition of a mate.
Past Environmental Assessments for removals of wild horses in this district indicate a unique knowledge of these animals among CCD preparers; characteristics, appearance and history are nearly always a component of EA's authored by this district. Not all districts do; this indicates to me that CCD possesses a working knowledge of these animals - their ancestry, perhaps even their habits. Field study of the herds and their grazing habits, forage preferences and individual herd growth rates are essential - as opposed to range studies, which attempt to seek out a primary causal factor of degradation. This specialized familiarity within HMAs could be beneficial first, in determining a viable, reasonable and accurate growth rate among particular herds, then in assessing which forage and water sources are being utilized (or over-utilized). In published Herd Statistics, a very limited number of HMAs throughout the BLM shows that some herds left minimally disturbed, while they do exceed AML, remain relatively small and stable, even over the long term - evidence that self-regulation of a herd is a possibility. Assignment of a particular HMA for study exclusive to the herd within it - perhaps on a seasonal basis - will provide a more thorough understanding of the animals and their environs. And in the event removals become necessary, the removals can be selective rather than contingent on a high percentage, as so many have become.
While it doesn't seem to be a popular notion, water or food-based bait trapping would appear, on it's face, to be a less stressful, more cost-effective method, though there does seem to be a potential for abuse, i.e., taking more animals than is strictly necessary to achieve AML. Also, a concern is the safety for the animals penned - the potential for tragedy should the traps not be checked often enough. But it might also, at least in theory, be another avenue to achieve selective removal as opposed to an overall gather. Older, adoptable animals could be removed, leaving family units intact and allowing the healthy elderly to remain on their ranges rather than be subjected to the rigors of capture and transport.
I went to a horse show and asked people there from other states what they thought the solution should be. Most were confused as to why the horses had to be rounded up. Why? That's right. They don't. Let them be freee, leave them alone. My idea is to at least get them out of the pens. There are plenty of people with large tracks of land that could take in a small herd and allow it to run free on their property in exchange for a small tax deduction. That would work. let themare be given the birth control and let them roam on private property with a contract for their care.
Send all the unwanted horses and burros to Madelaine Pickens' eco-sanctuary. She knows the proper way to treat animals.

Table C-12
Wild Horses and Burros

ALL citizens of this country own our public lands, not just those who want to run their privately owned livestock on them. Ask the average citizen on the street and they will tell you that they would prefer to see our wild horses and burros running free on publicly owned range lands. I know I certainly would prefer to see our wild horses and burros continue to roam free on public range lands, as they have for the past 500 years and more.
I began to write a screenplay a few months ago with the help of a producer who did THE BLACK STALLION, about the wild mustangs in Nevada. Everything you mess up in public gives me more story. I have beendisgusted and disillusioned over and over again to find the abuses of the BLM in books, in photos, in court cases. Never ending load of crap. I talked with Steve Spielbergs publicist after WARHORSE came out and connected him with Madeleine Pickens to see if he would be able to bring more of this to light in a way that is mutally beneficial. He agreed. He is reading and watching all the infromation she could send him about what is happening to the horses.
Numbers within the boundaries of HMA's should all be given a minimum management level of 150 individuals that are of reproductive age. AML's are severely too low consistently over all HMA's.
The FRWHBA clearly states that "It is the policy of Congress that wild freeroaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands." Please consider this manadate in any RMP revisions. http://www.employmentlawgroup.net/PracticeAreas/WhistleblowerProtectionAct.asp The greatness of a nation and its moral progression can be judged by the way its animals are treated. Gandhi SAVE OUR WILD HORSES equinewelfarealliance.org
I am writing to you about my concerns for the wild horses and burros that will be effected by the new revision of the Carson City District RMP. I realize wild horses and burros share the land with multiple users, but their needs to survive must be made a priortity over the needs of cattle ranchers, projects, and tourism! I feel the BLM has not done enough research to know what their needs to survive are! As a a tax payer I feel I have a right demand that the BLM use a larger portion of its herd management budget on research so they can confirm what is needed for these icons of American History to sustain themselves in viable, protected herds!
To perpetuate a use of public land, the viability of that use must be first priority. Populations must be managed to perpetuate the species with a minimal level of interference. Populations capable of breeding to sustain genetic viability, without interference, must be maintained before other uses are allowed. This should hold particularly true when weighing whether to grant grazing permits. Many within the US feel that such permits, and the conflicts created thereof, are often the reason behind roundups of wild horses and burros rather than true issues of welfare for those horses and burros.
The Carson City District should adopt a humane care standard for all roundups and with facilities in the district. Until the National office compiles and implements a policy the district should implement an interim policy to ensure the humane handling of animals. Humane handling would NOT include helicopter use for roundups. Helicopters create panic in the herds and often contributes to injuries and/or deaths in the herds. Roundups should be a LAST resort and only utilized after cancelling grazing allotments for livestock first. Livestock grazing should never take precedence over the continued presence and welfare of wild horse and burro herds.

Table C-12
Wild Horses and Burros

If current boundary lines do not allow for that viability standard, the authority to change those lines currently exists and must be reviewed. If areas are too small to accommodate the viable population then HA land bordering the HMA can be added. If areas are too small to support a viable population then the real possibility that the lines were flawed must be taken into account and corrected. All zeroed out HMA's or HA's must be restored to wild horses with sustainable herds and must not be zeroed out again.
The impacts to sex ratio skewing are not fully understood. Until further data is available that clearly demonstrates a population control impact without adverse effect to herd behavior it should be suspended. PZP should only be utilized within the confines of known seasonal effectiveness. Under no circumstances should surgical sterilization of mares be employed as the risk of infection and death is too great. Currently surgical sterilization of stallions should not be employed until impact to the behavioral structure on the range has been adequately documented ,and then only sterile procedures should be done with adequate pain medications by licensed veterinarians on stallions of ages that are safe. Stallions that are too old and colts that are too young must not be castrated.
Most Americans including ME and other nations as well are STRONGLY AGAINST HORSE SLAUGHTER. There needs to be laws in place to PROTECT COMPANION ANIMALS including HORSES.
These are public lands which means I have just as much say in the use of the lands as do the ranchers. Most Americans want our wild horses and burros protected and allowed to live on our public lands. It is time that ranchers had to pay for land at a level that other Americans have to pay when they want to use land. If a reasonable fee were charged to ranchers, then they would not be so determined to use our public lands and they might find other land to use. In a market economy they should pay a market rate and if that is not affordable to them, then they should turn elsewhere for a sustainable living. So either we have a market economy or we don't. Everyone wants a market economy until it affects them. You must start doing your job and protect our wild horses and burros as is the law. Start representing the people and not the ranchers as greed should not be your motivater.
With such a small amount of the tax payer provided budget spent on research, it should be easily confirmed that reassessment of the herd management plans are needed!
After well documented cruelty and abuse associated with the BLM's management of wild horses and burros I look forward to an honest acceptance of these animals in their rightful home. Please show me that you are not working for special interest groups.
I am very concerned about the new RMP revisions being considered for the Carson City District, specificaly in reference to how it will effect our wild horses and Burros.
As a young man, my father worked cattle from the back of a range bred mare named Snowball. His stories built my love and respect of our western lands and the people who make their livings there. I was able myself to share with my dad the horrible truth of what was being done to our wild horses into the 1970s, and to tell him the news when our President supported their protection. He would be saddened now to see what has been done to our wild horse herds in the name of "management" and for the benefit of special interests, and the inhumane treatment the horses endure at the hands of those who are supposed to safeguard them. My dad believed, as I believe- and as has been backed up by biological studies- that the land is better with horses on it than without them. Horses enrich the land, just as they enrich our lives.

Table C-12
Wild Horses and Burros

I cannot think of one person I know (family, friends, neighbors, co workers) who aren't aware of the the terrible plight (and future) of American Wild horses, burros and mules. Even folks who aren't horse enthusiasts or owners feel very upset and angry to know that animals we all agreed to treasure and protect, on lands we wanted to STAY WILD are being run to lameness and death by heliocopters, removed so cattle and drilling can take over their homes and now, maybe at risk of being turned over to slaughter - though the American people have spoken their outrage at the very idea of hauling terrified wild creatures to an obscene death, void of any respect or gratitude for their beauty. What are we now, Nazi's - we round up beings who are in our way, rob them of their home, force them into trucks like sardines with no regard for nursing mothers and fragile babies, pen them up like villians and jump at the chance to make a little money off them.
I am sending along this petition letter from the American Wild Horse Protection Cammpaign because, as a Canadian, I am appalled at the thought that the United States is endangering one of its most central icons, the wild horse. If Nevada can't afford its mustangs anymore, it should be folded up and filed as "No Longer of Interest".
I strongly object to the permanent sterilization, i.e. gelding, definitely NOT spaying mares as that is strongly discouraged as inhumane by the Department of Agriculture. I strongly object to sex ratio skewing of wild horses on the range.
Recreational vehicle activity should be minimized, as its damaging effect on range conditions has been widely documented and the animals have been harassed or killed.
Spend taxpayers monies testing for mad cow disease and protect the wild horses and burrows. Most Americans support the protection of these animals. What happened to democracy. This is going the way of what happened to the American Indian. We were so wrong then and we are going down the same road, except horse and burros cry and die. We are their voices!
Wild Horses and burros are part of our American heritage. They deserve a place to exsist in their wild state. How sad if they no longer exsited in the wild. There is no animal that captures the essence of freedom more than wild horses running as god intended. While selfishness is part of our profile as a species, we also can have a deep reservoir of empathy, and our capacity to understand the vulnerability and pain of others motivates so many good works in our society. That trait allows us to have an emotional connection with other species as well , horses are one of these animals. Let these horses remain wild .. And untouched by man kind.
Message to the BLM--you have simply got to STOP turning over original habitat, that supports America's native and natural wild horses, to the cattle and sheep industry... This--as you well know--is very detrimental to the land (as in Oklahoma of the late 1920's and early 1930's "Dust Bowl" catastrophe), on a scientific level, and a disgrace to America, on an ethical/moral level... If you want to generate *big* revenues, from these lands, then simply, initiate a "Wild Horse Tourism" division of the BLM, and begin taking groups of the public (with a *carefully* run program) into wild horse "Herd Areas," to observe, admire, and photograph them--as has *so successfully* been done with America's wolves, in Yellowstone National Park's "Lamar Valley"--which has generated in excess of *35 million dollars* for the people of the local Yellowstone environs.

Table C-12
Wild Horses and Burros

If these lands belong to the American Public, please let us have a chance to engage in the future of what is important to us. And it seems that there is a large amount the American taxpayers that want to make sure that the Mustangs and Burros are left in their homes and not moved out to be replaced by sheep and cattle in lieu of grazing permits. What about the possiblility of there being a new Agency made up of the American public that wants to keep the horses on the rangelands that have been designated for them and paid for by our taxes, to monitor and be taught how to manage and take part in implementing new ways for their freedom that is a win/win for all. Please think about this idea as an option for the roundups that separate the families and cause so many deaths.
The biggest problem in "managing" public lands is keeping them public and not trashed by energy companies, developers, cattleman, etc. with the big money to hire lobbeys who add riders on to bills allowing the trashing to continue. This is how the wild horse issue has become so dire. The horses are supposed to be "free ranging" and the BLM has be packed with special interest people who want the land the wild horses live on so they are no longer "free ranging", rather, kept like zoo animals in designated areas by killing, rounding up and penning, etc, in order to give their land to the people who pay congress to add those nasty riders on to bills that allow this mismanagement to continue. The word is getting out when we all see how the wild horses are being trashed by the corrupt BLM and the fight has just begun to return these horses their free ranging status as originally intended. The BLM doesn't round up deer, elk, antelope, etc. and put them in pens... Neither should they round up horses.
When developing the new Resource Management Plan (RMP), I urge the Carson City District Office to consider the interests of all American citizens and future generations of citizens, rather than giving sole consideration for commercial users of our public lands, thereby leaving little consideration for the wild horses and burros that the Bureau of Land Management has a legal and moral responsibility to protect and to ensure their survival. This consideration of the interest of tax payers, their children and the wild horses and burros must extend not only to the RMP, but to all other land-use documents tiered to it. The new RMP must recommend options to cease crowding out the wild creatures for the benefit of subsidizing cattle interests and fairly distributing resources. This translates to absolutely increasing wild horse and burro appropriate management levels (AML), absolutely reinstating wild horses to zeroed-out herd areas (HA) and ensuring that wild horses and burros are afforded equitable distribution of resources within designated habitat areas. Within the AMLs, scientists have recommended that the herds should never fall below 150 in order to maintain genetic viability and to be able to thereby sustain the wild horses and burros.
So you want to get rid of the wild horses and now the wild land..come on guys, use your time elsewhere and make a real difference.
PS Mostly try to be as natural and normal as possible in regards to the wild horses and burros AND their natural predators. I believe we humans are way overthinking and doing badly in most cases involving wildlife and nature.
I went to a horse show and asked people there from other states what they thought the solution should be. Most were confused as to why the horses had to be rounded up. Why? That's right. They don't. Let them be freee, leave them alone. My idea is to at least get them out of the pens. There are plenty of people with large tracks of land that could take in a small herd and allow it to run free on their property in exchange for a small tax deduction. That would work. let themare be given the birth control and let them roam on private property with a contract for their care.

Table C-12
Wild Horses and Burros

Take all that money that the BLM gets every year to "manage" them...and instigate their care out in the wild. You say they are starving buy some food and water and give your employees the gjob of feeding them where they find them rather than rounding them up and letting them rot in a cage.

The big question that I would like answered is why is it that every time in any country by the way, that a government is given the job of animal welfare, their answer if to kill everyone? Too nazi for me, Whynot save them instead of kill them? It is better for everyone to give up the round up. Makes you look bad, in every way. The BLM has a lot of tap dancing to do to get the public to think that anything they do is not a cover for who really wants them to do away with the horses. The cattle people. The rich land owners, who make the burgers.

Should HMA boundaries be adjusted, combined and/or eliminated? The HMA boundaries should remain the same. These HMAs are PRIMARILY for the use of wild horses.

What criteria should be used to make habitat and populaon suitability and viability determinaons?
If you have some horses that drink about 15 gallons of water a day, and you have solar projects that can use billions of gallons of water from an aquifer for just one project, or new mines and mining expansions that use a lot of water and you instruct mining companies to only do 10' and 20' water drawdown maps (instead of 1' and 5' water drawdown maps),and dig up tons of earth, or you're selling many acres of public lands for oil and gas leases, don't remove wild horses because of "degradation to the environment" or to keep a "thriving ecological balance." You will be perpetrating fraud against the American public by making this statement. You share an aquifer that doesn't stop at your BLM district office boundaries. If there isn't enough water or forage (because there isn't enough water) it is because the BLM is mismanaging land uses. For example, if you are worried about the drought, instead of fast-tracking solar projects, you should curtail them.

What methods, other than removal through gathers, should be considered to achieve AMLs?
How about a fair share for the wild horses? When I see the numbers of cattle and wildlife in the same area with a much bigger share, it is not fair. Be sure to monitor the HMA for carrying capacity.

Table C-12
Wild Horses and Burros

How should BLM address wild horse and burro urban-interface issues?

How about considering CUMULATIVE use in the area when using 2,4-D? Consider this:

The EPA says that 2,4-D is seventh largest source of dioxin in the U.S.

Dioxin DCDD that contaminates 2,4-D herbicide is not tested, measured or monitored by the EPA, or even regulated. A Canadian research paper states that dioxin DCDD may have large public health implications due to its prevalence in our food and environment.

DCDD is one of the hundreds of kinds of dioxin - (TCDD is the worst, but DCDD may be equi-potent):

http://group.bmj.com/docs/pdf/8_3_s10.pdf
"2,4-D is contaminated with an unmonitored form of dioxin, 2,7-dichlorodibenzo-p-dioxin (2,7-DCDD)...There is very little research on this form of dioxin, but in 1986 2,7-DCDD was found to be "equipotent" to the very toxic 2,3,7,8-TCDD in a test of immunosuppression. Given the wide use of herbicides that are contaminated with 2,7-DCDD there may be large public health implications of this contamination of our food and environment."
The BLM needs to do an aggregate risk assessment considering exposures to humans, animals, water, drinking water, plants from COMBINED SOURCES in the area. BLM should do Drinking Water Level of Concern (DWLOC) testing and use the Forward Calculation Approach to include in an EIS when planning to use 2,4-D.

According to the Environmental Protection Agency (EPA) 2,4D:

Exposure to 2,4-D has been reported to result in blood, liver, and kidney toxicity (1, 2, 4). Chronic oral exposure in experimental animals have resulted in adverse effects on the eye, thyroid, kidney, adrenals, and ovaries/testes (1). Experimental animal studies have demonstrated delayed neurobehavioral development and changes in neurotransmitter concentrations in offspring exposed during pregnancy or lactation (5-9).

Low concentrations of 2,4-D have been found in groundwater in some states. Agricultural run-off containing 2,4-D may contaminate groundwater in some areas.

Experimental animal studies of chronic oral exposure have reported adverse effects on the eye, thyroid, kidney, adrenals, adrenals, and ovaries/testes (1). In addition, some experimental animal studies have reported teratogenic effects (birth defects) at high doses, including increased fetal death, urinary tract malformation, and extra ribs (15, 16). When adult female experimental animals were exposed to 2,4-D during their pregnancy and lactation periods, their exposed offspring exhibited neurological effects, including delayed neurobehavioral development (5) and changes in several neurotransmitter levels or binding activities (6-9, 17) and ganglioside levels (18, 19) in the brain. Delayed neurobehavioral development was manifested as delays in acquisition of certain motor skills such as the righting reflex (5).

Table C-12
Wild Horses and Burros

Which HMAs are suitable for the long-term management of wild horses and burros? ALL OF THEM. These were designated primarily for the use of wild horses. BLM is in violation of FLPMA when it favors uses that make money (which BLM obviously does).
What age structure and sex raos are appropriate to ensure healthy future herds of wild horses and burros? Natural family bands are appropriate. The elders pass along wisdom, needed for survivial of the herds. Stop meddling with sex ratios, you are experimenting with the wild horses when you do this.
Where are habitat improvement projects appropriate? What kinds of improvement projects are feasible? Drill some wells or pipe in some water for sources of water for the wild horses. The logistics are easier than planning a roundup, and it would be cheaper than roundups.
Any commercial usage of public lands should be charged a fair market rate for use of valuable resources with those funds applied toward implementation of the above recommendations in support of the legitimate primary responsibility to protect wild horses and burros.
Any other issues or concerns with the management of wild horses or burros? Yes. The BLM does not have an accurate count of the wild horses. Do you have any aerial photographs or video of bands from pre-inventory flights? The BLM can only legally remove horses if there is an EXCESS, and the BLM cannot prove that there is an excess. BLM uses flawed "guess-timates."
I have American Indian in my gene pool and was allowed to go to an Indian School in my last year of highshcool, where I learned how the history books had whitewashed the real stories about what happened to Indians. They pushed them on to land they couldn't survive on and then let them die off. Same thing that is happening to the wild horses. Push them on to land they can't live on and then call in your expert veterinarians to say it is the humane thing to do to kill them. Crock. When did the BLM ever care about the welfare of the health of a horse? Just a dead one. That is the aim of the group, there are too many photographs out there of the neglect they suffere once in the pens to argue about that.
I have a giant concern with the way that wild horses and burros are gathered. I do not understand how Michael Vicks can be sent to prison for shooting dogs and yet the BLM can use helicopter round-ups on horses, a clearly abusive practice, especially during the foaling season, with no oversight by any animal protective services. There should be real transparency in the actions and practices of the management of wild horses and burros. I call for the use of third party observers to all gatherings, and video verification of the way the animals are gathered, the conditions of gather and the treatment of the animals during the capture and their life afterwards.
I also believe that it is in opposition to the function and mandate of the BLM to remove wild horses and burros from public lands to replace them with livestock. If a choice must be made about the access to use of public lands, isn't the BLM charged with the mandate to provide for the wild horses and burros first? If the environment is compromised by grazing or access to water, why are more cattle put on? From the average American's viewpoint, it sure seems that the horses are being "removed" so that those with the power to do so can use public lands for their own purposes (livestock, etc.) with the BLM as their agent. The horses were removed and more cattle were put on the same ranges?!? Why are taxpayers paying for tens of thousands of wild horses to be kept in holding centers where no one from animal welfare agencies are allowed to see what is going on?
Please consider the truth of the whole picture and understand that once the questions are out there, they must be addressed. The interest of Americans in the care and management of our wild horses is growing.

Table C-12
Wild Horses and Burros

wild horses are a symbol for freedom and independence, close connected with the history of the USA. What happens with them now by the roundups of the BML is only a shame.
I am writing to urge Carson City to do the right thing and protect these horses and burros. Too often the BLM has cared more about eradicating and removing the wild horses and burros that have called these lands home and instead given preference to ranchers and cattle. That is not "land management," but being in the pockets of those who make money from these practices. Please, don't remove these animals. They have called this land home a lot longer than humans or cattle have been there. They deserve to stay there in peace.
PZP is now EPA approved and offers a cost-effective and humane alternative for population control. Further, I strongly object to the permanent sterilization (i.e. gelding, spaying, etc) of wild horses on the range and object to sex ratio skewing without the completion of significant scientific studies to outline and understand the implications of sex ratio adjustment on the range.
If reduction in livestock grazing still falls short in allowing for viable wild horse herds, then expansion of range boundaries must be implemented. Each of the above areas is surrounded, at least in part, by BLM lands. Most HMAs are smaller subsets of the original areas legally designated for the herds (HAs). If this is the case in Dogskin, Granite, and Flanigan, then expanding the boundaries to those original HA boundaries is well within the legal authority of the Carson City District. Or, if the areas are surrounded by other BLM lands, then expanding the range to allow for a viable herd should be undertaken.
With this in mind, where feasible, we recommend that bait and or water trapping replace helicopter stampedes. When a band is captured we recommend that all mares (females one year an older), be darted with the most long acting, but reversible, PZP drugs available. If true excess can be established, we recommend that only the young, adoptable animals be removed. It is terribly cruel and economically unwise to remove old animals that have lived all their lives in freedom. Many will not adapt to captivity and the change in diet. BLM's own employees in both Colorado and Nevada have stated this to us.
Using Steiter-Lites in lieu of roundups would fulfill the minimum feasible clause of the Act, and keep burros out of holding. According to Roger Oyler, State Lead for Burros and Wild Horses in Arizona, even burros are not being adopted at the present time. Leaving burros on the range is essential from both a humane and fiscal standpoint.
When is it appropriate to develop or augment water for horses and burros? Always. It's a lot cheaper that roundups. If BLM were not allowing projects that were sucking up so much water out of the aquifer for a lot of other uses, there would be enough water for the horses. BLM gives all sorts of perks to other uses (like those FONSIs for uses that really DO have a lot of significant impact.)

ISSUE 9: FIRE MANAGEMENT

Table C-13
Fire Management

Wild and Prescribed Fire, Fuels Management, and Emergency Stabilization and Rehabilitation (ES&R) NDOW recommends wild and prescribed fire, fuels, and ES&R (collectively termed Fire Program) focus on managing for rangeland health and integrity. We recognize that decisions must be made with limited resources in regards to prioritizing suppression, fuels management, and rehabilitations efforts. NDOW encourages the CCD to model travel management plan addressing OHV issues. Items we recommend addressing in the travel management plan include: 1. Permanent Road Closures: We support the closure of duplicate destination roads, no longer used mine exploration grid roads, and mitigation of resource impacting or degrading routes. Increased road densities have been proven to impact wildlife through habitat loss and fragmentation, increased stress levels demanding higher energy requirements, and direct mortality. We encourage closed roads to be reclaimed. We discourage the elimination of sole source access that provides a road option for wildlife recreationists. 2. Temporary Road Closure/Seasonal Restriction: We encourage temporary seasonal restrictions to occur on roads to avoid wildlife resource impacts. For example, seasonal restrictions should occur in crucial mule deer winter ranges during the winter season to lessen stress. 3. Overland travel and unauthorized user-created roads: We understand and support the need to control the ever expanding network of new trails created by individuals into areas without roads. We recognize the resource damage that can occur and are willing to cooperatively work with the CCD to prevent its occurrence. 4. Game Retrieval: We support allowing challenged hunters the opportunity for game retrieval. 5. Signage: NDOW suggests marking "closed" roads as such and leaving "open" roads un-marked. Signage is a direct way to inform users of closure and is not dependent upon the individual having a travel management map in their possession. 6. Law Enforcement: We encourage increased law enforcement activities to address unauthorized use. Additionally, we encourage unauthorized use reporting. Furthermore, a coordinated process should be developed jointly by NDOW and the BLM as it is our expectation that the majority of the violations will be documented by NDOW wardens who have no enforcement authority over federal regulation pertaining to travel restrictions. 7. Education: We encourage educating the public and OHV user groups about the potential wildlife impacts that are associated with unauthorized travel. We also encourage working cooperatively with OHV groups to build trust, ensuring participation and increasing unauthorized use reporting.
Fire Prevention Wild Horses and Burros should be partnered with Smokey Bear when it comes to wildfire prevention on public lands. Here, again, I quote Craig Downer, who has made a lifetime study of these wonderful animals: Their post-gastric digestive system is better able to handle dry, coarse vegetation and to process this without over-expending metabolic energy and to leave less degraded humus to enrich and build the soils, and make them more water-retentive (in relation to ruminant grazers, i.e. the rest). The broad-roaming habit of wild horses and burros also lends itself to their role as preventers of catastrophic fires. Also, they disperse more viable seeds of a greater variety of species in their ample movements over their large home ranges. All this and more makes them fire-preventers or minimizers par excellence!
Fire Management: Again in the Pinenut area noticed trail closure due to erosion. What I've noticed is riders riding around closed trail closures and continuing on the closed trail. I think if the trail was left open new trails or riding around closures would be less damaging and keep riders on established trails.

Table C-13
Fire Management

These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified.

The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts

The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.

Emergency Stabilization & Restoration: Non-native plants should rarely be used for rehabilitation, only temporarily in critical wildlife habitat areas or areas of excessive erosion potential until native plants can be established. Vegetative recovery objectives should be set for all rehabilitation projects, monitored for effectiveness, and closed to disturbances until recovery objectives are achieved.

My husband and I are recreational shooters and we use the desert, we are not the slobs leaving a mess out there. The same ones who dump their trash out there are probably the same ones who use the trash for fire practice or just use it for fun. We police out shells and take everything with us, we take water out with us in case of fire and when the conditions look like it will be too dry, we simply do not go out. We take safety seriously and we take the care of Nevada seriously and to penalized us for others carelessness is beyond unfair.

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5) The forest resources and forest products need to be treated equally with other resources in the CCDO.
A) Ensure that all users of forest resources are citizens of the United States.
B) Reduce overburdening rules and simplify stipulations for the public that use forest resources.
C) Maintain low permit fees and utilize the Free-Use regs in the CFR to offer forest products for free, when the products are not being used for profit.
D) Make sure that all forest products are offered to both the general public and commercial users. The CCDO has a history of not offering forest products to commercial users (example: pine nuts) and this is totally unfair to the public.
E) Many forested areas within the CCDO jurisdiction are in need of thinning (density management). Utilize the public to help thin this resource - encourage public participation versus discouraging them.
F) Follow guidance in the Healthy Forest Restoration Act and Healthy Forest Initiative in the management of forest resources.
G) Maintain Old Growth and follow Large Tree Retention guidelines in forested areas where treatments are planned/implemented.
H) Reforest forested sites that are burned in wildfires.

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3. Livestock Grazing: Today, there is far less livestock on public lands, by design or by cultural change. Years ago, livestock assisted in keeping certain types of flamable brush in control of overgrowth due to their feeding needs. With the lack of livestock being allowed in certain areas, Nevada has experience far more rangeland fires. Because of the influence of environmental extremists of wanting to turn our open lands back into a "natural state", we no longer have what use to be natural fire management.

Table C-13
Fire Management

2. Fire Management: Several years ago 1000's of acres were needlessly burned because one government agency, on site, could not enter another agency's domain.

This fiasco is an example of mismanagement, possible to much duplicity of overlap of one agaency and the next -- a costly expense to the taxpayer.

Fire Operations
7-j. ISSUE: The proposed Conservation Measures fail to address the fact that non-federal fire personnel who are involved in BLM wildland fires may be in command positions.
Federal agency fire personnel are pretty good about trying to use agency program guidelines when they can during a wildfire on their home units and other places when they're made aware by resource advisors. However, many wildfires now involve state and even local volunteer firefighters. These people are often in command positions; coordination with them on something like sage grouse guidelines may not occur. Non-federal personnel often just order things done like the immediate use of bulldozers and don't coordinate with federal firefighters -even on federal lands. They often don't know and don't care about Conservation Measures the federal agency is mandated to use. Even if coordination does occur, the state and locals don't incur the legal risks and challenges on the Conservation Measures and possible ESA listing that the federal agencies do; there is no downside for ignoring these.

If wildfires occur, removal of livestock for a minimum of 7-10 years must be required. Specific recovery criteria for native grasses, forbs, shrubs and microbiotic crusts must be applied and attained before grazing can again resume. Following any fires, re-seeding rehab will only use native species, will use local native ecotypes, and will mimic natural spacing patterns - i.e. dense wheat field like seedings of tall coarse cultivars will not occur. Following any fires, rehab will not result in building temporary or other fences. Instead, grazing will be removed from the pasture and/or allotment in order to provide undisturbed habitat and buffer conditions for species just suffering new habitat loss.

Exotic Seeding Reclamation/Restoration
Active restoration of crested wheatgrass seedings must be conducted through:
>inter-seeding of sagebrush and forbs.
>removal of CWG with techniques minimizing use of herbicides

Active restoration of cheatgrass infestation areas without loss of shrubs cover to the maximum extent possible. In all cases of seeding - local native plant ecotype seeds and seedlings must be used. By far the cheapest and most cost-effective method to recover and restore plant communities is to remove livestock grazing and trampling disturbance from those communities that have not yet undergone significant weed invasion. These communities will be buffered to help limit weed infestations. This will also maximize site resiliency if fires occur, and understories will be in better condition andmore readily able to heal. It is unrealistic to think that BLM can prevent wild land fires, and methods often proposed by the agency have significant adverse impacts -ranging from planting aggressive weedy species to promoting more cheatgrass through removal of shrubs which results in a hotter, drier, morefire and cheatgrass-prone site with a longer fire season.

Table C-13
Fire Management

Fire Management: We suggest that BLM use clear-cutting to protect public lands from the encroachment of houses in the urban interface areas and the associated fire danger from these urban infringements; otherwise, the public will continue to pay for the costs of protecting private structures adjacent to public lands and, in effect, subsidizing private urban development. The RMP should evaluate the long-term effects of fire suppression on forest health and public safety and theuse of prescribed fires to achieve healthy woodlands in the CCD area. Intact sagebrush areas should be retained for Sage Grouse, not burned and not "green-stripped" or otherwise destroyed in the name of fire "protection." Any stripping should occur directly adjacent to private property. The RMP should evaluate the benefits and costs of the use of green stripping and other fire prevention activities in critical wildlife habitat areas in order to avoid further fragmentation of intact sagebrush areas.
You are asking for another Sagebrush Rebellion. Oh yeah, you let all the sagebrush in our beautiful state burn to the ground and now we have an endangered species for you to use as an excuse to take away our land. Here is a good rule of thumb. If it ain't broke don't fix it. Stay out of the land business and stick to putting out fires when they start. That will help us out more than any of your land grabbing laws aimed to keep us from using the land that we love.

ISSUE 10: LIVESTOCK GRAZING

Table C-14
Livestock Grazing

If wildfires occur, removal of livestock for a minimum of 7-10 years must be required. Specific recovery criteria for native grasses, forbs, shrubs and microbiotic crusts must be applied and attained before grazing can again resume. Following any fires, re-seeding rehab will only use native species, will use local native ecotypes, and will mimic natural spacing patterns - i.e. dense wheat field like seedings of tall coarse cultivars will not occur. Following any fires, rehab will not result in building temporary or other fences. Instead, grazing will be removed from the pasture and/or allotment in order to provide undisturbed habitat and buffer conditions for species just suffering new habitat loss.
Scoping Handout- 6.3 Livestock Grazing Livestock grazing negatively impacts sage-grouse habitat, WH&B habitat, wildlife habitat, water resources, forage resources and the air and soil itself.

Table C-14
Livestock Grazing

Removal of Grazing from Sensitive Areas, and Limitations on Any Grazing Use that May Continue BLM must also analyze other alternatives, too, that significantly reduce livestock grazing to levels below actual use and focus on removal of grazing from sizable areas of importance for species conservation in the landscape. BLM must overcome its own long-standing entrenched resistance to considering the adverse impacts of livestock grazing. A range of alternatives must include actions that remove livestock grazing disturbance and a significant portion of the battery of harmful fences, water developments, salt/supplement weed spawning sites --- from large portions of the landscape in important habitats for sage-grouse,pygmy rabbit and other species conservation. In any areas where grazing might continue, the agency must significantly reduce grazing levels far below actual use that has been occurring. The agency must honestly apply much more conservative and required measurable mandatory limits on livestock use. This must be coupled with avoidance of any grazing/trailing disturbance during sensitive periods of the year - including nesting, birthing and wintering periods. These conservative levels of use must include both riparian and upland trampling standards. It must include standards that protect microbiotic crusts, understory components and sagebrush/shrub structure. These standards must serve as triggers for livestock removal from the land area being grazed – in order to prevent annual exceedances. They must be mandatory, and be required to be met annually. The agency must commit to annual timely monitoring, or livestock cannot be grazed.
For any remaining grazed lands: The use levels that must be applied leave must 9 inches of residual native grass cover across understory communities. This must be based on the native perennial grasses that are present. It must be based on sites, especially deeper soil sites and sites actually used to a considerable degree by livestock -not on cherry-picked sites distant from water where larger statured grasses may remain in depleted landscapes. Only one grazing disturbance bout can be allowed. Otherwise, "double dipping" -or repeated use occurs which is harmful to sage-grouse and vegetation. Under repeated grazing bouts in the same year, total use may significantly exceed a percentage allowed for one period use - due to plants re-growing between bouts. Trailing should not be allowed back through areas that have been grazed.
Typically, a 10-15% upland utilization must be put in place. It must be measured at sites that are actually used to a significant degree by livestock. BLM cannot apply 30% or 40% utilization –because this is greatly inadequate to prove necessary residual nesting cover (9 inches) and to promote adequate recovery of depleted understories. No matter what size grasses may be present, utilization measured by BLM is averaged across the grass plants that are grazed. So typically, when an area "averages" 40% utilization, this means that many grass plants are grazed to levels of 60-80%. Such use levels - even onetime use this severe by livestock- can severely harm or kill native bunchgrass plants by removing growing plant parts and depleting scarce root reserves, as well as by exposing the grass crown to winter freezing damage or summer heat-desiccation. See USDI Technical Bulletin Anderson 1991, Mack and Thompson 1982. There must be no use during active growing periods for native grasses and forbs. It is very difficult if not impossible to accurately measure how much use occurs when plants are grazed while actively growing.
BLM must also apply an upland trampling standard to limit disturbance to soils, microbiotic crusts, and native plants including seedlings. This must require that less than 5% of the area of a square meter monitored at representative typically grazed sites across the pasture is trampled. No areas of the allotment, including those receiving the most intensive use, should be allowed to receive greater than 10% of the surface area being trampled. Ranchers have horses and herders, and concentrations of livestock cannot be allowed. These disturbed sites create epicenters of disturbance where weed invasion, and then outward spread due to chronic livestock disturbance occurs.
Stocking must be properly applied so that these standards can be attained during every grazing disturbance episode. This all provides for protection of microbiotic crusts, a frontline defense against cheatgrass and other invasive species.

Table C-14
Livestock Grazing

At least 6 inches of stubble height must remain on all riparian/meadow area herbaceousspecies at all times, including drier sites not right on the greenline. This must be applied to all species- not just Nebraska sedge - and during all periods of livestock use. Riparian shrub browse and/or breakage must be limited to 5% of livestock-accessible new growth.
Areas back from the green line must be measured and monitored and these standards applied in these areas, too. Mesic and meadow areas that are not right by the water's edge are much less likely to regrow - yet are critical for protecting and conserving vital watershed values, and protecting riparian/meadow areas linked to aquatic habitat health. They are essential to provide sage-grouse brood rearing and recovery of habitat components for species. Agencies have long biased monitoring of impacts by measuring only the thin greenline right by the water's edge, thus examining species likely to regrow following heavy grazing rather than the vegetation in the adjacent riparian/meadow area which provides suitable conditions for the forbs required by sage-grouse broods. See for example, Ohmart (1996), Belsky et al. (1998).
BLM must also apply shrub protection standards, and require shrub structural integrity standards. No sagebrush plants or other shrubs anywhere in the pasture should receive more than 5% breakage or other impacts. All of these standards must be applied as triggers for immediate removal of livestock from the pasture. If the use level is reached, the livestock must be moved out. If any of these standards are exceeded in any year, livestock reductions in numbers will be put in place - with reductions of 25-50% for each violation along with more herding and other requirements. If ranchers are unable to meet these standards, they are unable to control their livestock, so the herd size is too large. If standards are exceeded in multiple years, livestock grazing must be ended in the pasture. Salt and especially supplement will not be used. Livestock trailing to salting/feeding sites - and the impacts of concentrated use at these sites -severely alters and reduces native vegetation. These disturbed sites provide centers for cheatgrass, medusahead, and other weeds to spread outward from.
Seasons of Use No grazing will be allowed in sage-grouse habitat during lek and nesting periods. Thisperiod is March 1 through June 20 or later. This must be applied to all sagebrush habitats, and to protect nesting migratory birds as well, and pygmy rabbits with young in shallow natal burrows. These habitats must be fully identified as part of the current process. Every effort must be made to avoid grazing areas critical for brood rearing, as well. No grazing will be allowed in sage-grouse habitat during winter periods. This must be applied to all sagebrush habitats. These habitats must be fully identified as part of the current process. This protects birds from disturbance and displacement by livestock management activities. In all instances of avoidance, livestock use must not be shifted and intensified into other fragile sites or vegetation communities, or other rare species impacted.

Table C-14
Livestock Grazing

Exotic Seeding Reclamation/Restoration
Active restoration of crested wheatgrass seedings must be conducted through:
>inter-seeding of sagebrush and forbs.
>removal of CWG with techniques minimizing use of herbicides

Active restoration of cheatgrass infestation areas without loss of shrubs cover to the maximum extent possible.
In all cases of seeding - local native plant ecotype seeds and seedlings must be used. By far the cheapest and most cost-effective method to recover and restore plant communities is to remove livestock grazing and trampling disturbance from those communities that have not yet undergone significant weed invasion. These communities will be buffered to help limit weed infestations. This will also maximize site resiliency if fires occur, and understories will be in better condition and more readily able to heal. It is unrealistic to think that BLM can prevent wild land fires, and methods often proposed by the agency have significant adverse impacts -ranging from planting aggressive weedy species to promoting more cheatgrass through removal of shrubs which results in a hotter, drier, morefire and cheatgrass-prone site with a longer fire season.

No Grazing Alternative
BLM must fully analyze environmental effects of the No Grazing Alternative. This analysis is essential to set a solid comparative effects baseline and fullyunderstand the significant ecological toll of any continued grazing use. Yet we fear that BLM is highly unlikely to adopt this across the entire landscape due to entrenched agency mindsets. It must be adopted in ACEC areas. We have proposed ACECs in association with the sagegrouse EIS, and request that you also consider those here. We request that all sage-grouse ACEC proposals submitted for that process be carried forward in this RMP - in case that process gets delayed or otherwise goes astray. Grazing permit retirement must be undertaken, and the Land Use Plan must achieve this. Permit retirement is necessary under all alternatives.

All of this must be applied to protect the values of the sagebrush ecosystem. BLM frequently attributes problems with lands and waters to historic grazing - ignoring that the current chronic grazing disturbance incrementally eats away at the remnants. Grazing prevents or greatly slows "recovery". And even if one were to believe that "historic" grazing caused all the problems one sees on public lands, there are now scientifically recognized new threats. Continued grazing and trampling depletion and disturbance are threats. Grazing causes and/or exacerbates other "threats" that BLM often relies on to brush problems away - like cheatgrass and fire.

Targeted active restoration actions that focus on removal of disturbances or developments promoting degradation such as sources for weed invasion and spread or that are promoting degradation of habitat components or diseases must be considered, as well. This is a very complex and important landscape that is under great threat from livestock degradation. See Mack and Thompson (1982), Fleischner et al. 1994, Ohmart 1996, Belsky et al. 1999, Knick et al. 2003, Dobkin and Sauder 2004, Connelly et al. 2004 Conservation Assessment for Greater Sage-grouse, Knick and Connelly 2009/2011 Studies in Avian Biology Chapters, USFWS Warranted But Precluded March 2010 finding for greater sagegrouse, recent BLM Instructions memos and sage-grouse habitat mapping, recent state sagegrouse plan and map iterations, and conservation planning documents. See also Interior Columbia Basin Ecosystem Sciences documents that highlight ecological concerns in the sagebrush and arid lands biomes. Example: Wisdom et al. (2002). See Great Basin and Nevada Rangeland Health Assessments conducted by BLM in mid-2000s, but that did not fully consider grazing's adverse impacts.

Table C-14
Livestock Grazing

I am writing to ask that the revised RMP prioritize wild horses and burros according to law and the will of the American people.

My concern is for the protection of the place wild horses and burros legally and historically are to occupy. Their legal, rightful habitat is steadily being encroached and their legal presence minimized, and I write to ask that this practice be reversed in the new RMP. How very refreshing that will be.

When directed by law to consider them "an integral part of the natural system of the public lands," we need to give flesh and bone to that mandate by actually preserving and prioritizing land principally but not necessarily exclusively (to quote the law) for them. Currently it is cows and sheep that are defacto managed as "integral," with the vast majority of the range's resources being allocated to them.

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2) Public/private cooperatives
Public/private cooperative arrangements must adhere to all standards as any contractual agreement and must be made available for public comment and competitive bid. Any public cooperative that requires removal, handling or range repair (springs, fencing) must be reviewed carefully against any standard of conflict of interest.

No livestock grazing permittee should hold any permit to remove wild horses from any public land.

The language in the standing RMP (quoted below) must be enforced with the recognition that this language applies to all permitted activity, including extractive industry.

Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly.

What criteria should be used to make habitat and populaon suitability and viability determinaons?
Scientific research that is fully vetted that includes the study of impact of all large animals utilizing the land (cattle). An additional comment: studies of African wildlife populations and the effects of drought and cattle raising shows that habitat goes through big temporary changes, some of which do not look attractive. Bounceback should be the important factor.

CCDO Planning Area Open to Livestock Grazing --
Size: 5,000,000 BLM acres (approximately), with many allotments inside HAs and HMAs
Cattle-Grazing Year-Round Equivalents: 13,579 cow+calf units
Acres per cow+calf: 368

CCDO Planning Area Open to Wild Horse and Burro Grazing --
Size: BLM acres: 1,998,807
Currently-Assigned Maximum Level: 3,505 wild horses in
Acres per horse: 570

CCDO Planning Area that Should Be Open to Wild Horse and Burro Grazing --

Table C-14
Livestock Grazing

Size: BLM acres with reinstatement of 363,810 acres from HAs: 2,362,617
Increase of 2,915 to Currently-Assigned Maximum Level: 4,145
Acres per horse: 570

CCDO Planning Area that Should Be Open to Wild Horse and Burro Grazing --
per acres per cow+cal f --
Size: BLM acres with reinstatement of 363,810 acres from HAs: 2,362,617
Increase of 640 to Currently-Assigned Maximum Level: 6,420
Acres per horse per cow+calf approach: 368

Note: I was unable to identify two small HAs. (Tule Ridge / Mahogany Flat?) One is southwest of Flanigan HMA, the other southeast of it and northeast of Dogskin Mountains HMA. These HAs should also be reinstated and repopulated with wild horses and/or burros.

Augusta Mountains -- Recommended for reinstatement of HA
Size: BLM acres: 176,208
Currently-Assigned Maximum Level: 308 wild horses
Acres per horse: 572
Size: BLM acres with reinstatement of 135,518 acres from HA: 311,726
Increase of 237 to Assigned Maximum Level: 545
Acres per horse: 572
P^3 Herd Size (with management): 500
Acres per horse: 352
Acres per horse with HA: 624
P^3 Herd Size (without management): 2,500
Acres per horse: 71
Acres per horse with HA: 125

Clan Alpine
Size: BLM acres: 298,064
Currently-Assigned Maximum Level: 979 wild horses
Acres per horse: 305
P^3 Herd Size (without management): 2,500
Acres per horse: 119

Desatoya
Size: BLM acres: 157,838
Currently-Assigned Maximum Level: 180 wild horses

Table C-14
Livestock Grazing

Acres per horse: 877
P³ Herd Size (with management): 500
Acres per horse: 316
P³ Herd Size (without management): 2,500
Acres per horse: 63

Dogskin Mountains
Size: BLM acres: 6,497
Currently-Assigned Maximum Level: 15 wild horses
Acres per horse: 433
P³ Herd Size (with management): 500
Acres per horse: 13
P³ Herd Size (without management): 2,500
Acres per horse: 3

Flanigan
Size: BLM acres: 16,319
Currently-Assigned Maximum Level: 125 wild horses
Acres per horse: 131
P³ Herd Size (with management): 500
Acres per horse: 33
P³ Herd Size (without management): 2,500
Acres per horse: 7

Garfield Flat
Size: BLM acres: 125,420
Currently-Assigned Maximum Level: 125 wild horses
Acres per horse: 1,003
P³ Herd Size (with management): 500
Acres per horse: 251
P³ Herd Size (without management): 2,500
Acres per horse: 51

Granite Peak
Size: BLM acres: 3,981
Currently-Assigned Maximum Level: 18 wild horses
Acres per horse: 221

Table C-14
Livestock Grazing

P^3 Herd Size (with management): 500
Acres per horse: 8
P^3 Herd Size (without management): 2,500
Acres per horse: 2

Horse Mountain
Size: BLM acres: 49,572
Currently-Assigned Maximum Level: 95 wild horses
Acres per horse: 522
P^3 Herd Size (with management): 500
Acres per horse: 99
P^3 Herd Size (without management): 2,500
Acres per horse: 20

Horse Spring -- Recommended for reinstatement of HA
Size: BLM acres: 15,302
Currently-Assigned Maximum Level: 0 wild horses
Acres per horse: 0
Size: BLM acres with reinstatement of 15,302 acres from HA: 15,302
Increase of 42 to Assigned Maximum Level: 42
Acres per horse per cow+calf approach: 368
P^3 Herd Size (with management): 500
Acres per horse: 31
Acres per horse with HA: 31
P^3 Herd Size (without management): 2,500
Acres per horse: 6
Acres per horse with HA: 6

Lahontan
Size: BLM acres: 6,937
Currently-Assigned Maximum Level: 10 wild horses
Acres per horse: 694
P^3 Herd Size (with management): 500
Acres per horse: 14
P^3 Herd Size (without management): 2,500
Acres per horse: 3

Table C-14
Livestock Grazing

Marietta Wild Burro Range
Size: BLM acres: 64,466

Impact on Livestock Grazing

The Act provides for wild-horse ranges to be managed principally for their benefit. BLM's attempt to define away this right by making distinctions among wild horse ranges, herd areas, and herd management areas is rejected as disingenuous. Obviously, BLM has been carrying out an inverted policy. BLM's Carson City District allocates two and a half times more resources to privately-owned livestock than wild horses. BLM appears blind to its favoritism toward permit-holders who, as it is, are getting cheap grazing slots and even on public lands that are supposed to be dedicated principally to wild horses. This state of affairs requires a 180-degree turn. It is time to rectify this inequitable distribution.

Therefore, CCDO should ...
-Buy out grazing permits in allotments that are within or that adjoin HAs, HMAs
-Buy "checkerboard" private lands that are inside and/or border HAs, HMAs
-Buy state-owned lands that are inside and/or border HAs, HMAs
-Negotiate land swaps with the state and private property owners.

Livestock Production -- Business Sector Outlook 2010

The livestock industry sector has been in decline for some time now. According to the National Cattlemen's Beef Association's (NCBA) "Cattlemen to Cattlemen" program that aired on September 7, 2010 on RFD-TV, producers were not holding back their heifers to become part of their cow herds for future growth. The program noted that it takes three years to build a cow herd; so this trend was likely to be long-lasting. The principal reasons given for this decision were:
-Many operators are getting out of the business,
-Young people are not getting into the business, and
-General economic conditions were poor.

CCDO can reduce and phase out cattle grazing in the HMAs without disadvantaging the cattle industry. Unused AUMs should be reassigned to the wild horses and burros.

Livestock Producers -- Growing Older, on Average

At the link below, you will find industry statistics on beef production. This fact-sheet notes that the average producer age is 58, up from 56 in 2002, per the USDA 2007 Ag Census. Thus, industry participants are approaching normal retirement age at a time of changes and challenges for the sector. Many producers may be interested in selling their ranches to the BLM as a way to exit the business. CCDO should secure funding in order to be ready to accommodate them, and thereby consolidate federal land holdings.

Http://www.beefusa.org/beefindustrystatistics.aspx

Table C-14
Livestock Grazing

Livestock Production -- Business Sector Outlook 2011

How do things look now? According to the "Cattlemen to Cattlemen" program that aired on November 1, 2011 on RFD-TV, 500,000 to 600,000 "mamma cows" are expected ot be "liquidated" in the coming months. The southern regions of the United States continue to suffer from prolonged drought. Large numbers of cattle have been sent to feed lots and slaughter due to the lack of forage and water. Grain prices are high, adding an extra $150 per head to producer costs. Although prices for beef products have risen, sales have sagged here in the United States. The NCBA's panel of experts implored producers to hang onto their cows and stay in the game because global demand for beef is expected to increase ... in the coming decades. Recent free-trade agreements were cited as providing eventual access to foreign markets. However, the target countries have more stringent -- and costly -- demands on imported meat. For instance, the requirement for age-and-source verification (ASV) traceability can, according to the NCBA panel, add $30 to $45 per head to costs.

The questions are: Can American beef producers nearing retirement age ...
-Wait for decades for the global demand for beef to increase,
-Survive financially during the prolonged drought,
-Absorb the higher costs of doing business, and
-Meet the new market standards for ASV?

Clearly, CCDO can and should gradually phase out cattle grazing in the HMAs. Measures to make the transition more acceptable to livestock interests can ease the way.

Table C-14
Livestock Grazing

Water Sources -- Protect Them, Add Guzzlers, Forget Pipelines

CCDO needs to establish alternative water sources for the current principal consumers -- ivestock -- as well as for the wild horses, burros, and other wildlife. As landlord of the multiple-use range, BLM is responsible and accountable for providing water sources and maintaining them. However, installing miles of pipelines to bring water to the livestock constitutes inappropriate subsidization of the beef sector.

Instead, rain and snow catchment devices, commonly referred to as "guzzlers," should be strategically installed throughout the planning area, especially in the HMAs. Guzzlers capture, conserve, and release water, much like cisterns. Such systems are long-lived and require little maintenance, especially if constructed of cement. Their covers reduce evaporation -- a beneficial feature that provides an advantage over open reservoirs. Guzzlers also reduce the need to haul water into wilderness areas, should there be a\ severe drought.

Guzzlers come in all sizes and configurations. Those with a 10,000-gallon storage tank can support herds of big game animals -- and mustangs. Such large guzzlers can be buried underground, thus preserving wilderness vistas. Construction materials can be hauled into remote areas by helicopter, which will be a "constructive" use of the aircraft services contract. Below are the links to Web sites for more information on guzzler use by all sizes of animals. Guzzlers can even be used by humans. These Web sites also address guzzler design and construction, including a materials list and schematics.

Http://www.tpwd.state.tx.us/publications/pwdpubs/media/pwd_bk_w7000_0032.pdf
http://www.tpwmagazine.com/archive/2003/dec/legend/
http://wildlife.utah.gov/wr/0706guzzler/0706guzzler.pdf
http://muledeercountry.com/2009/09/mdf-water-guzzler/

Second Water Option → Less Time in Streams; plus, Counter-Intuitive Findings on Grazing

Research shows that providing a second, non-stream source of water significantly decreases the time cattle spend in natural streams. Cattle stayed an average of only 1.6 minutes with a second source, but lingered 25.6 minutes without one. A second water source also enables the same range to accommodate 85 to 150 additional AUMs. These findings would appear to support guzzler installation throughout the CCDO's jurisdiction..

Additional studies have found that pasture size and distance to water have a greater effect on cattle foraging activity than does the grazing system (continuous vs. rotational). These findings suggest that rotational grazing systems are unlikely to improve animal performance over continuous grazing unless pasture size and distance to water are reduced below previous levels.

Other studies have found that, ironically, cattle spend more time in areas where the forage has been intensively grazed the previous year than in areas that have been rested -- not grazed -- during the preceding year. Forage in areas that had been grazed during the previous year had higher crude protein concentrations than in areas that had been rested. Further, the research shows that forage quality and quantity can be improved by burning and fertilization.

Http://jas.fass.org/content/82/13_suppl/E147.full

Table C-14
Livestock Grazing

As for bighorn sheep and wild horses, competition between the species has not been supported by a number of recent studies. For instance, Wockner, Singer, and Schoenecker (2004) reported that ...
" ... our data suggested no obvious negative effect of horse grazing or the presence of wild horses on bighorn sheep. Bighorn sheep demographic patterns did not differ between the wild horse-bighorn sheep and bighorn-only areas. We found no differences in pregnancy rates, lambing rates, or lamb survivorship in bighorn sheep inhabiting areas on versus off the wild horse range (pregnancy rate of ewes (± s.e.) was 77 ± 4%, and lambing rate was 68 ± 5%, overall), although our sample sizes were small. This finding is in general agreement with those of Kissell and others (1996) and Coughenour (2000), who found little overlap in use of resources. Kissell and others (1996) and Coughenour (2000) found considerable spatial and habitat separation. Even where habitats were shared, diets tended to be largely different between the two species."

The researchers found spatial and habitat separation between bighorn and horses during all seasons.
http://www.fort.usgs.gov/Products/Publications/21300/21300.pdf

CCDO's HMAs should become primarily horse or burro management area. Mustangs should be given priority for forage, with livestock interests subordinated to wild horse needs. Wildlife are said to be increasing to the point of being rounded up themselves by the State of Nevada. Obviously they have no problem sharing the range with wild horses. Livestock are a problem for wildlife, however, and should be phased out steadily over the life of the RMP Revision.

The language in the standing RMP (quoted below) must be enforced with the recognition that this
language applies to all permitted activity including extractive industry. "Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly."
Please recognize that the vast majority of the public is unaware of the decision making process on public land. There is an assumption that horses exist protected and viable due to an act of Congress. A greater effort needs to be made to educate the public to the multitude of projects that have potential impact. The damages to wild horses are not being appropriately mitigated without public participation, yet the public remains uneducated to the process.

Short and long-term monitoring sites must be established based on site visits with all Interested parties. These sites must represent areas receiving significant amounts of livestock use.

No Grazing Alternative
BLM must fully analyze environmental effects of the No Grazing Alternative. This analysis is essential to set a solid comparative effects baseline and fully understand the significant ecological toll of any continued grazing use. Yet we fear that BLM is highly unlikely to adopt this across the entire landscape due to entrenched agency mindsets. It must be adopted in ACEC areas. We have proposed ACECs in association with the sagegrouse EIS, and request that you also consider those here. We request that all sage-grouse ACEC proposals submitted for that process be carried forward in this RMP - in case that
process gets delayed or otherwise goes astray. Grazing permit retirement must be undertaken, and the Land Use Plan must achieve this. Permit retirement is necessary under all alternatives.

Table C-14
Livestock Grazing

Livestock grazing has at least the following major negative ecological impacts:

· Significantly Alters Plant and Animal Communities (Wagner 1978, Jones 1981, Mosconi & Hutto 1982, Szaro et al. 1985, Quinn & Wal-Genbach 1990, as cited in Fleischner, 1994) (Belsky, Matzke, Uselman, 1999) (Donahue, 1999) (Wuerthner, Matteson, 2002)

The negative impacts of livestock grazing are well documented and most scientists have indeed recommended the removal of livestock from public lands in order to improve the ecological conditions and protect the native flora, fauna, and other public resources (Fleischner, 1994) (Donahue, 1999) (Belsky, Matzke, Uselman, 1999) (Wuerthner, Matteson, 2002).

Scoping Handout - 8.3 Riparian
As stated in this legal document (link below) prepared by BLM, it is livestock and not wild horses that cause extensive riparian damage. Wetlands and Riparian Zones Ranchers and BLM wild horse and burro (WH&B) staffers commonly believe that horses spend less time in wetlands and riparian zones than do cattle. Under this premise the grazing of wild horses the likelihood of stream bank degradation is assumed to be less than with cattle grazing. Ftp://ftp.blm.gov/pub/whb/WHB%20EAs/EA%20NM-040-2009-082%20JANUARY%202010.pdf Thus the majority of riparian damage in the CC RMP district can be eliminated by the removal of livestock and the elimination and/or close monitoring of any and all other commercial interests being permitted to operate on public land. This monitoring and these decisions must be honestly and scientifically valid and not politically driven, as we have seen done over and over in the past.

Designated wild horse and burro ranges (HA) are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This obviously will require reductions or closure to livestock grazing regardless of the political influence by the grazing permit holders.

Exterior fences on all herd areas would be acceptable for the protection of the animals and the public but all interior fences in wild horse and burro herd areas must be removed allowing for the intermingling and thus genetic health of the animals as well as to allow the animals free migration and natural range rotation. With livestock grazing eliminated on legal herd areas, all riparian fencing would be unnecessary as WH&B and wildlife would automatically and naturally disperse seasonally to water sources and forage sources.

Livestock Grazing
Livestock grazing has contributed to the economic base of rural Nevada. We believe that the BLM has been able to sustain resource utilization and that prohibiting grazing would be detrimental to the health of our public land.

We recommend that a complete review be made of all Appropriate Management Levels (AMLs) within the Herd Management Areas (HMAs) managed by the Carson District.

AMLs should reflect the true intent of the Wild Horse and Burro Act (the Act) in regards to "principally but not necessarily exclusively" clause. At least 51% of forage should be allocated to wild horse use, rather than the tiny portion currently allocated. This may require decreasing the number of privately owned livestock on these HMAs. Livestock grazing is a discretionary use of public lands and, as such, BLM has the statutory authority to reduce or eliminate livestock grazing by permittees. On the other hand, BLM is required to manage for "sustainable" herds of wild horses and burros.

Table C-14
Livestock Grazing

If reduction in livestock grazing still falls short in allowing for viable wild horse herds, then expansion of range boundaries must be implemented. Each of the above areas is surrounded, at least in part, by BLM lands. Most HMAs are smaller subsets of the original areas legally designated for the herds (HAs). If this is the case in Dogskin, Granite, and Flanigan, then expanding the boundaries to those original HA boundaries is well within the legal authority of the Carson City District. Or, if the areas are surrounded by other BLM lands, then expanding the range to allow for a viable herd should be undertaken.

Livestock Reduction/Energy Development

Competition for water between wild horses and livestock on public lands in the Carson City District is a real and escalating problem. On legally designated wild horse ranges, which constitute such a small percentage of all public lands and a small percentage of public lands in comparison with privately owned cattle, the wild horse and burro should receive its fair share of not only forage, but water. As the principle user on these relatively few areas, the Act mandates fairness. We recommend that any reductions in use should occur among the ranks of the private livestock on public lands not wild horses.

In years like this one, when Carson District public lands have received less than normal moisture, cattle and sheep should be removed, so that the legally designated, principle grazers remain-namely wild horses and burros. The kneejerk reaction made to remove wild horses in northern Nevada without considering other alternatives is shortsighted and unnecessary. The majority of these animals will be warehoused. Now more than ever, this should be a last resort option, not the unsustainable first choice.

Likewise, water guzzling energy projects should not be allowed on HMAs or HAs. In this day and age, it is simply out of the question to allow projects that are water intensive to proceed on water-challenged public lands.

We recommend that if geothermal projects are allowed, it should only be with a legal assurance from the developer that there will be adequate water for all wildlife, including wild horses and burros and that the land will eventually be restored to its pre-development state or in a better state than when development began.

Livestock should be removed immediately if a permittee repeatedly ignores the rules of the permit as has apparently been the case in western Nevada. Bullying the BLM should not be permitted. It goes without saying that a permittee who defies the Agency and knowingly continues to break the terms of his agreement should have his livestock confiscated.

Table C-14
Livestock Grazing

The BLM acknowledges the need to more fairly allocate resources and to allocate more resources to wild horses and burros due to the increasing public support for these federally protected animals. The AWHPC urges BLM to incorporate a preferred alternative with the following components:

• Eliminate or decrease livestock grazing in HMAs, pursuant to 43 C.F.R. 4710.5(a), which authorizes BLM to close livestock grazing on areas of public lands"if necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury." A decrease in livestock grazing would preserve the BLM's multiple use mandate while also fulfilling the agency's mandate to preserve and protect wild horses and burros.

• Designate HMAs to be managed principally for wild horse and/or burro herds under 43 C.F.R. 4710.3-2.

• Give priority to wild horses and burros over livestock and big game species (either re-introduced/introduced) within designated HMAs.

• Re-evaluate zeroes out HAs for re-introduction of wild horses and or burros and reinstatement as HMAs.

• Minimize or eliminate harmful commercial activities within wild horse and burro areas, including gas and oil exploration, geothermal, mining and recreational vehicle activity.

• Fairly allocate forage and water resources for wild horses and burros within designated herd management areas-end the BLM practice of allocating the majority of resources within HMAs and HAs to livestock and other commercial uses.

Removal of Grazing from Sensitive Areas, and Limitations on Any Grazing Use that May Continue BLM must also analyze other alternatives, too, that significantly reduce livestock grazing to levels below actual use and focus on removal of grazing from sizable areas of importance for species conservation in the landscape.

BLM must overcome its own long-standing entrenched resistance to considering the adverse impacts of livestock grazing. A range of alternatives must include actions that remove livestock grazing disturbance and a significant portion of the battery of harmful fences, water developments, salt/supplement weed spawning sites --- from large portions of the landscape in important habitats for sage-grouse,pygmy rabbit and other species conservation. In any areas where grazing might continue, the agency must significantly reduce grazing levels far below actual use that has been occurring. The agency must honestly apply much more conservative and required measurable mandatory limits on livestock use. This must be coupled with avoidance of any grazing/trailing disturbance during sensitive periods of the year - including nesting, birthing and wintering periods. These conservative levels of use must include both riparian and upland trampling standards. It must include standards that protect microbiotic crusts, understory components and sagebrush/shrub structure. These standards must serve as triggers for livestock removal from the land area being grazed – in order to prevent annual exceedances. They must be mandatory, and be required to be met annually. The agency must commit to annual timely monitoring, or livestock cannot be grazed.

Table C-14
Livestock Grazing

The AWHPC urges BLM to incorporate a preferred alternative with the following components:

• Enhance range conditions, including the restoration and improvement of water sources for wild horses and other wildlife species, the elimination of fencing which prohibits wild horses and burros from fully utilizing the HMAs/HAs, etc. Range rotation, re-seeding temporary fencing, restoration/enhancement of water resources, and reduction of livestock grazing must be among the tools used to protect and restore any areas that do not meet habitat or rangeland standards.

• Re-introduce wild horses to the zeroed-out Herd Areas including Tule Ridge/Mahogany Flat, Pah Rah Mountains, Horse Springs, southern portion of the Pine Nut Mountains Herd Areas (HAs) where livestock grazing continues to be permitted. Private ranchers should not profit and benefit from their unwillingness to allow wild horses to remain in these HAs - therefore all livestock grazing should cease if wild horses are not permitted in these areas.

The District's claim that due to the private-public checkerboard ownership issues, the agency eliminated all wild horses from these areas is not sufficient. The BLM has the authority to temporarily or permanently eliminate or reduce livestock grazing to provide habitat for wild horses and/or burros.
Therefore, the BLM must either work with the permittees (in the Pah Rah Mountains HA that includes the Spanish Springs/Mustang (03052), Olinghouse (03041) and White Hills (03058) allotments; in the Horse Springs HA that include the Horse Springs (03032) and Stockton Flat (03053) allotments) to either tolerate wild horses on their private lands or eliminate the privilege of grazing on adjacent public lands. This also applies to the permittees with allotments in the southern, zeroed-out portion of the Pine Nut Mountains HA which include the Buckeye (03509), Pine Nut (03576) and Churchill Canyon (03518) allotments.

• Protect predators and predator prey (i.e. mule deer, etc.) in an effort to restore natural population control mechanisms where possible and thereby restore a truly 'thriving natural ecological balance." It is essential to protect predator-prey populations in order to support predators in an area.

• Utilize a non-hormonal, reversible fertility control, such as PZP, where necessary, to control wild horse reproduction and avoid mass removals of wild horses from the range.

• Forbid the implementation of any permanent sterilization of horses and/or burros as a means to manage or control population growth.

5. ISSUE: Experimental livestock grazing / unauthorized ground disturbing activities can be done
In the recent past, the CCDO has allowed livestock permittees to design and perform experimental livestock grazing. Ground disturbing activities in support of the experimental grazing have been done without cultural clearances / NEPA. The CCDO has heard another experimental grazing / ground disturbing proposal in another area.

In addition, the EISs for the RMP should include hard data on range conditions, impacts of livestock grazing on the range and a clear delineation on maps and in the analysis of the impacts on wild horses and/or burros caused by all commercial uses allowed within the HMAs.

When revising its land use policies and establishing Appropriate Management Levels (AMLs) for wild horses and livestock grazing allotments, the BLM must consider social factors including prevailing public opinion. NEPA requires Federal agencies to consider environmental effects that include, among others, impacts on social, cultural, and economic resources, as well as natural resources. Thus BLM must consider both legal and social factors, in making land use decisions, such as setting and maintenance of AML and grazing allocations.

Table C-14
Livestock Grazing

Following are specific answers to questions listed in the RMP 6.3 Grazing Fact Sheet:
The Carson City District currently permits 156,731 Animal Unit Months (AUMs) for use within the district-- that is the annual equivalent of 13,060 wild horses. This disproportionate allocation of resources on out public lands must be reformed.

BLM Question: What livestock grazing management practices are appropriate to maintain and/or restore properly functioning vegetative communities?
Livestock grazing should be withheld from areas not meeting rangeland standards. In addition, the BLM should mandate that livestock be moved on a daily basis in order to prevent overgrazing in areas. It is well documented that livestock tend to congregate around riparian areas-- therefore moving livestock on a daily basis should reduce damage to riparian areas.

BLM Question: What criteria should BLM use to determine suitability for livestock grazing use?
If the range is not meeting standards for rangeland health, livestock grazing should not be permitted. In addition, livestock grazing should be reduced or eliminated in HMAs and HAs in order to accommodate wild horses and burros. While the BLM has a multiple use mandate, there is no requirement that livestock grazing be permitted on all public lands managed by the agency. Therefore the required multiple use mandate may be fulfilled without the allowance of livestock grazing. The RMP must reflect this clarification and provide greater flexibility with the reduction or elimination of livestock grazing.

BLM Question: What criteria should BLM use to determine areas that should not be available to livestock grazing?
If the range is not meeting standards for rangeland health, livestock grazing should not be permitted. In addition, at minimum wild horses and burros should be allocated the same, if not more, resources than livestock in that area. The BLM if federally mandated to protect wild horses and burros, the agency is not mandated to permit livestock grazing in all areas.

BLM Question: How should vacant allotments be managed?
Vacant allotments should be used as substitution for allotments in HMAs and HAs-- this would allow the permittees an opportunity to relinquish AUMs in an HMA/HA and allow the BLM to reallocate those AUMs within the HMA/HA to wild horses and/or burros.

BLM Question: What criteria should be utilized to determine if additional forage is available to consider Temporary Non-Renewable (TNR) grazing above the preference and/or authorize temporary changes in use that are deemed outside the terms and conditions of the permit?
If the range and riparian areas are not meeting all standards for rangeland health, livestock grazing should not be permitted. In addition, if additional forage is available within HMAs and HAs that should be allocated for wild horses and burros which are federally-protected animals. The BLM should not expand grazing "outside the terms and conditions of the permit."

BLM Question: What criteria should BLM use to determine appropriate triggers and end-point indicators as terms and conditions of grazing permits?
An appropriate trigger and end-point indicator for terms and conditions of grazing permits should include if the range and riparian fail to meet health standards for two consecutive years. The failure for more than two consecutive years is an indicator that grazing should cease in order to allow the range and riparian areas time to recuperate.

Table C-14
Livestock Grazing

Vegetation: BLM's primary responsibility to manage vegetation to support all of the multiple uses of public lands is a critical one. Ensuring the achievement of standards and guidelines for healthy rangelands for the grazing and wild horse and burro programs is a good first step. The RMP should address which allotments and HMAs are meeting these requirements and what actions the BLM is taking to ensure that non-attainment problems are resolved, with specific deadlines for "progress" to be made. Correcting poor management is much more cost-effective than "treatments" to achieve healthy rangelands. The benefits and costs of proposed vegetative treatments should be closely evaluated, especially to sensitive wildlife, in order to avoid the listing of additional species harmed by these projects. Livestock and WH&B numbers and seasons of use should be adjusted in order to achieve requirements for healthy rangelands and to provide adequate habitat for wildlife. Non-native plants should only be used temporarily to stabilize lands disturbed by wildfires or other events until native vegetation can recover. What is the status of vegetation monitoring in the CCD? Is effectiveness monitoring required and implemented on vegetative treatments?
Grazing: BLM questions to the public in scoping documents, including appropriate grazing management practices, determination of suitability and non-suitability for grazing, and the use of TNR grazing, are answered in existing BLM manuals and other requirements. In addition, grazing must be in compliance with the standards and guidelines for healthy rangelands for the CCD. The RMP should determine if the CCD grazing program is in compliance with existing BLM requirements and correct any actions, decisions, or permits which fail to meet these requirements. TNR use should be rarely permitted, as a good precipitation years provide not only "additional" forage for livestock, but also the rare opportunity for some extremely valuable Great Basin plants to reproduce, such as Mountain Mahogany and bitterbrush. Livestock grazing should be managed to prevent, not exacerbate, the spread of invasive species. Livestock permittees whose grazing use is meeting or exceeding the standards and guidelines for healthy rangelands should be rewarded by the BLM in order to encourage this positive stewardship of public lands.
The most egregious abuse of our public lands is by the ever increasing number of cattle that use up the resources. The cattle ranchers must find private lands to graze their cattle and pay those higher fees instead of paying the paltry fees that the BLM has afforded them, or else reduce their herds
The RMP should accommodate, either permanently or temporarily, wild horse and/or burro population numbers over AML through conversion of livestock grazing AUMs to wild horses and burros while simultaneously utilizing reversible, non-hormonal fertility control to suppress population growth. The establishment of AMLs for wild horses and burros should be based on sound science and actual range monitoring data which differentiates between the impacts of livestock and wild horse/burro grazing.
Wild Horses belong in the wild. Cows do not. Coyotes, Wolves, and Cougars belong in the wild. Cows do not. There should be no privately owned cows on our public owned lands. Eating beef is not good for our economy, our environment, or our health.
STOP! Before you wipe out these wild horses completely, they have every right to these HAs even more so since Congress granted them protection and the grazing rights. The BLM has seemed to forget it's responsibility to the wild mustangs and Burros, stop and think is your duty to cattleman and sheep herders? NO.....YOUR DUTY IS TO PROTECT THESE MAGNIFICENT AMERICAN ICONS!!!

Table C-14
Livestock Grazing

I object to the helicopter roundups which maim and kill. These wild horses are part of our natural legacy and deserve better management than this. I believe the new policy should keep and maintain these animals in their wild historical habitats and ranges. That the cattle be reduced or removed entirely. That the horses are treated humanely. That any method of fertility control be based on sound science and that will allow the strongest and fittest to survive and thrive. Further, historic herds should not be separated nor culled. Mother Nature knows best and these animals have survived for generations without interference and done just fine. The laws of nature are the best method for ensuring their survival. We need to get back to the basics and not treat them as if they are a nuisance. We must be responsible stewards of our environment. I also concur with the below statement in its entirety. These folks - American Wild Horse Preservation Campaign - are in it for the horses, not for special interests. You should listen to them.
Please start giving the horses a break. Public land shouldn't just be for cattle. All horses and wildlife should access to grazing and water. Quit saying it's the horses fault! Cattle outnumber horses at least 50-1! So it isn't just the horses! Stop with welfare ranching!
Get rid of non-native cattle and there will be LOTS of room for the horses.
Please! You must not cave in the special interest groups such as ranchers who don't want to give up their cheap, subsidized grazing land. The land belongs to the American people and we have made it clear we want the horses to stay and less cattle destroying the land.
When plans are developed that only cater to ranchers and money, these plans are developed to only cater to a very small number of citizens of the USA. I oppose any similar rules that exclude the rights of wildlife in other parts of our country, not just the west and wild horses or burros.
The above makes me proud to read the above, for it is detailed, comprehensive, and while it will take hard work, it is the work that must and should be done to stop preference to cattle grazing and water use, and set mandated limits to cattle, and ensure that we preserve, honor, our horses and burros. Please do implement the above.
This is public land for wild animals. Not privately ownd domestic animals. Tell the cattle men to buy private land for their cattle and leave the public land for the wild animals.
Every time I hear politicians talk about the federal deficit, I shake my head over the amount of taxpayer dollars that is spent rounding up wild horses and burros to appease the cattle industry. The BLM was designed to oversee public lands for the entire country, but this agency has turned into a lap dog for cattlemen. Every time I look at a hamburger, I think about the countless suffering inflicted upon wild horses and burros and have a salad instead.
In addition, the Environmental Analysis for the RMP should include hard data on range conditions, impacts of livestock grazing on the range and a clear delineation on maps and in the analysis of the impacts on wild horses and/or burros caused by all commercial uses allowed within the HMAs. Water usage should be clearly defined and allocated -- and fair distribution of this valuable resource must be a cornerstone of the RMP -- commercial usage of public lands should not receive the lion's share of the water resources. Wildlife, including wild horses and burros, should receive adequate allocations. Stop catering to your corporate paymasters, the cattle ranchers....especially at the expense and suffering of the horses. The corruption and influence peddling is obvious to everyone. Be ashamed.
I urge the Carson City District Office to consider the interests of ALL Americans, not just local and commercial users of our public lands (read: ranchers and their damn cattle, not to mention their money and the fact that Salazar is in their pockets!!), when crafting the new Resource Management Plan (RMP) and all other land-use documents tiered to it.

Table C-14
Livestock Grazing

LIVESTOCK GRAZING 3. ISSUE: Requests have been made for livestock grazing on Winter's Ranch Winter's Ranch is an open space area in Washoe Valley that is presently recovering from 100 + years of private use by man and overuse by livestock. Willows have returned to areas of the Ranch that were bare as have many other native dry meadow species of vegetation. There have been requests to graze the area.
I realize farming and ranching is incredibly hard work at any time and I appreciate all they do for our country. But there has to be some HUMANE solution and I believe this to be it! These wonderful creatures, who have served mankind for centuries, remain symbols of the freedom we all hold so dear.
Message to the BLM--you have simply got to STOP turning over original habitat, that supports America's native and natural wild horses, to the cattle and sheep industry... This--as you well know--is very detrimental to the land (as in Oklahoma of the late 1920's and early 1930's "Dust Bowl" catastrophe), on a scientific level, and a disgrace to America, on an ethical/moral level... If you want to generate *big* revenues, from these lands, then simply, initiate a "Wild Horse Tourism" division of the BLM, and begin taking groups of the public (with a *carefully* run program) into wild horse "Herd Areas," to observe, admire, and photograph them--as has *so successfully* been done with America's wolves, in Yellowstone National Park's "Lamar Valley"--which has generated in excess of *35 million dollars* for the people of the local Yellowstone environs.
Lake Lahontan, the area where I live, was a perfect place for wild horses. The wild horses would come down from the mountians to drink and eat the grass and weeds growing by the Lake and Carson River, until the BLM roundups started. Now there are cows where the wild horses used to be. Cattle Ranching on Public Lands and state and federal parks should not be allowed. Get those cows off our land! Wild horses belong in the wild. Private owned Cows belong on private owned land.
Horses, burros and other wildlife must have water, you can not take that away from the animals that have federal protection to it. It is a necessity for life and 80% of Americans want our wild horses protected from the commercial users (cattle ranchers). They are illegally stealing and killing the wildlife for their greedy industry. These are Americans??? They are thugs.
STOP KILLING OUR WILD HORSES BECAUSE YOU CAN NOT STAND UP TO THE CATTLE RANCHERS.
THESE HORSES HAVE BEEN THERE LONG BEFORE ANY OF YOU DECISION MAKERS OR MONEYHUNGRY RANCHERS. FOR ONCE, DO THE RIGHT THING. MAKE A DECISION YOU CAN HONESTLY LIVE WITH AND NOT ONE THAT WILL HAUNT YOU.
It saddens me the way BLM mistreats America's wild horses and burros. Why haven't they jumped at Madelaine Pickens' offer to send the imprisoned horses to her eco horse sanctuary? Why are you so eager to please the cattle ranchers?
The BLM must stop favoring the cattlemen, removing wild horses and replacing with cattle, appears to be Illegal. The American public has a right to expect fairness on our public land. I would hope a Government Agency would want the respect of all Americans, not a special few, with deep pockets.

Table C-14
Livestock Grazing

As an important Government agency the BLM should be interested in fairness to the American public. The BLM should Increase wild horse and burros herd management levels, if fairness is considered. Using up to date scientific methods. The herds must have enough horses to keep genetic viability. The BLM should fulfill there obligation to manage the wild horses and burros on public land. Public land Is for multiple use. Cattle are overrunning our public land. This Is not what the ROAM ACT of 1971 mandated.
Allocate resources equitably. Livestock and other commercial usages should not be allocated more resources than, or given preference over, wild horses and burros in designated herd management areas. The BLM has a mandate to protect wild horses, while livestock grazing occurs at the discretion of the Secretary of the Interior. Therefore, the agency must prioritize wild horse and burros on the small amount of BLM lands still designated as habitat for these animals.
Stop the "zeroing out" of wild horse and/or burro herds. Range rotation, re-seeding temporary fencing, restoration/enhancement of water resources, and reduction of livestock grazing must be among the tools used to protect and restore any areas that do not meet habitat or rangeland standards. Reintroduce wild horses to the zeroed-out Tule Ridge/Mahogany Flat, Pah Rah Mountains, Horse Spring, southern portion of the Pine Nut Mountains Herd Areas (HAs) - where livestock grazing continues to be permitted. Private ranchers should not profit and benefit from their unwillingness to allow wild horses to remain in these HAs - therefore all livestock grazing should cease if wild horses are not permitted in these areas.
Designate all HMAs to be managed principally for wild horse or burrow herds as allowed under 43 C.F.R 4710.3-2. If need be, decrease or eliminate livestock grazing, in HMAs pursuant to 43 C.F.R. 4710.5(a). A decrease in livestock grazing would preserve the BLM's multiple use mandate while also fulfilling the agency's mandate to preserve and protect wild horses and burros, as mandated by the Free Roaming Wild Horse and Burros Act, which is the law. I have nothing against cattle. I like them. These, however, are Wild Horse and Burro Herd Management Areas, and as such, Wild Horses and Burros should be prioritized, not blamed for the damages they do not cause. "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, and integral part of the natural system of the public lands"

Table C-14
Livestock Grazing

Good range management should include:

RANGE MANAGEMENT/ DATA

All forage allocations (AUMs) within the Herd Management Area should be included in the range-management data.

Monitoring which distinguishes between Wild Horse impacts as compared to grazing livestock and other wildlife impacts on range resources.

Water usage should be clearly defined and FAIRLY allocated

Maps and analyses which clearly show impacts on Wild Horses and/or Wild Burros caused by any and all commercial usage of public lands within the HMAs.

Full disclosure of all cattle guards in the Herd Management area.
Any and all cattle guards should be either removed or fitted with Wild Horse Annie cattle guards which are specifically designed so as to be safe for Horses and Burros to cross.

Commercial usage of public lands should not receive the lions share of water resources. Wildlife, including wild horses and burros, should receive adequate allocations.

I feel that there is too much removal of our wild horses. Livestock owners should keep their livestock on their private land. This would solve a lot of problems.

The right thing is to work for the benefit of all and to show integrity. The original purpose of the BLM
was to manage and preserve designated lands for the benefit of the wild horses. See, there was a time when this country's lawmakers knew and understood that the wild horses are a national treasure. They belong to all of us. By "removing" them for the big oils companies' gain or the cattle ranchers gain you are showing that you are against the American people and their national treasure!

I also believe that it is in opposition to the function and mandate of the BLM to remove wild horses and burros from public lands to replace them with livestock. If a choice must be made about the access to use of public lands, isn't the BLM charged with the mandate to provide for the wild horses and burros first? If the environment is compromised by grazing or access to water, why are more cattle put on? From the average American's viewpoint, it sure seems that the horses are being "removed" so that those with the power to do so can use public lands for their own purposes (livestock, etc.) with the BLM as their agent. The horses were removed and more cattle were put on the same ranges?!? Why are taxpayers paying for tens of thousands of wild horses to be kept in holding centers where no one from animal welfare agencies are allowed to see what is going on?

We recommend water continue to flow to livestock water developments through the hot summer months even when livestock use of the water development isn't occurring. Wildlife becomes habituated and reliant upon water at development sites while being utilized in conjunction with livestock operations. These development sites can act as wildlife traps if water is discontinued when livestock use is no longer occurring. If water is discontinued during the hot summer months then wildlife dehydration is likely to occur that may result in wildlife mortalities.

Table C-14
Livestock Grazing

Range Management
7-f. ISSUE: The proposed Conservation Measures fail to include a discussion of the conversion of sheep dominant grazing to cattle dominant grazing on public land as being a potential indirect impact on sage grouse and their habitat.
In Nevada and throughout much the West, there has been a shift in the dominant domestic livestock grazer on public lands. Not long ago, domestic sheep were the most common permitted livestock on grazing allotments in the CCDO. Domestic sheep closely mimicked the predominant historic grazer - wild bighorn sheep. Economic and other factors caused the gradual switch to cattle. This has and will have an important effect on the rangeland with sage grouse habitat. Cattle select grasses and forbs as the preferred forage. Cattle often stay in one area, eating until the understory is gone, or the cattle are removed. Under cattle grazing over time, rangelands become dominated by "increaser" shrubs and encroaching woodlands as "decreaser" understory species, choice native grasses and forbs are used. Domestic sheep however, eat little bits of grasses, forbs, shrubs and small pinyon-juniper trees that can keep a vegetation community more balanced. Additionally, domestic sheep are herded daily and can easily be rotated throughout a pasture / allotment. Cattle are occasionally pushed, certainly not daily, and often return to an area already grazed. Domestic sheep grazing may assist in maintaining sage grouse food items such as ants and certain forbs for chicks. In eastern Nevada, when the majority of grazing allotments had domestic sheep rather than cattle (pre-1980-90's), sage grouse numbers were strong and fluctuated within a normal range.

7-g. ISSUE: Yearlong livestock grazing that is allowed on the CCDO has a negative effect on sage grouse and their habitat and needs to be addressed in the RMP.
See discussion in issue #4 related to livestock grazing.

7- h. ISSUE: The class of cattle permitted in sage grouse habitat has not been discussed in the Conservation Measures and needs to be addressed in the RMP.
The class of cow that grazes may be important to sage grouse habitat. Rangeland managers and livestock producers know that cow / calf pairs use a grazing allotment differently than steers, particularly yearlings. Cows tend to remain in gentler topography and nearer water which in Nevada means areas with riparian areas. Stockmen tend to not push pairs into rougher country. Use levels on riparian areas and bottom lands are met quickly - often well ahead of the AMP's "off" date. When this occurs, pairs often remain in the pasture or allotment for a variety of reasons; utilization levels are exceeded, riparian / range conditions change or deteriorate. Conversely, steers will travel farther within an allotment to seek forage and can be pushed into rougher country. Yearling animals exhibit a natural curiosity that helps disperse these animals better and they can be pushed further into rougher country.

I am a registered voter in the state of Nevada. I am deeply concerned about the bias shown to proprietors and private interests versus the wildlife and public interests when it comes to the management of our public land. Wild horses and burros should not be removed only to make way for the land to be leased for cattle grazing or mining. It completely discredits the claim that there is not enough food or water.

2) Re-establishment of game (mule deer) in the Pine Nut Mountain range. I believe that in previous years most the mule deer population in the Pine Nuts was killed illegally by local shooters, Indians, squatters, and poachers. Postings for poaching, fines, and imprisonment would help along with more involvement from Fish and Game to increase the mule deer population. The 3 Basque sheepherder's (that I am aware of) that spend summer in the Pine Nuts and carry guns need to be educated per the rules of Fish and Game.

Table C-14
Livestock Grazing

Should HMA boundaries be adjusted, combined and/or eliminated? At a minimum, HMA boundaries should be adjusted and combined in order to create contiguous Wild Horse habitat areas. The fact that HAs were based on locations where horses existed in 1971, but then pared down for human management convenience, demonstrates that horses have "lost ground" from the start. Grazing should be eliminated from HA/HMA areas to reduce the conflicts between ranchers / livestock and wild horses. In my opinion, it was a mistake to allow permittee grazing in HAs - a public relations problem that has worsened the situation.
3. Livestock Grazing: Today, there is far less livestock on public lands, by design or by cultural change. Years ago, livestock assisted in keeping certain types of flamable brush in control of overgrowth due to their feeding needs. With the lack of livestock being allowed in certain areas, Nevada has experience far more rangeland fires. Because of the influence of environmental extremists of wanting to turn our open lands back into a "natural state", we no longer have what use to be natural fire management.
I think it is important to limit livestock grazing that is currently taking over the mustang herd areas.
1) Aspen/cottonwood Management should be a priority for this office. Inventory existing aspen/cottonwood stands on BLM managed lands and set up a program to protect the stands being impacted by grazing. All stands should be protected within six years and a inspection/mantainance program set up on an annual basis to maintain exclosures.
1) Aspen/cottonwood Management should be a priority for this office. Inventory existing aspen/cottonwood stands on BLM managed lands and set up a program to protect the stands being impacted by grazing. All stands should be protected within six years and a inspection/mantainance program set up on an annual basis to maintain exclosures.
2) The same type of program should also be set up for Springs and other sensitive riparian areas. Many springs/riparian areas are being hammered by horses and livestock in the CCDO jurisdiction. A program should have been set up and fully implemented years ago for this.
As an almost life long Nevada resident, I find it appalling that BLM has denigrated itself down to range mangers for the cattle industry. You do not work for the cattle industry, you work for the people of the United States in managing their property. It is your fudiciary duty to make sure that the needs and concerns of the MAJORITY of the American people are met and sustained. The Cattle Lobby are NOT the majority of the American people, yet they seem to have the power over decisions made by your agency. I urge you to seriously consider and impliment the suggestions below. Please remember that cattle are visitors on the American People's land. Horses are residents.
There was never any need for the masacre of the mustangs, politician, cattlemen, all found that paying for what they wanted, grazing rights for their cows, a leg up in a political career, whatever the excuse or justification for their murder , it is still that: an excuse.
Please consider what is good in the long term for the horses and burros; not just the immediate use or for only those in these areas. It should be about more then ranchers and the fees you can make off of them using the land, so moving the horses and burros from it.

Table C-14
Livestock Grazing

Designate all HMAs to be managed principally for wild horse or burro herds as allowed under 43 C.F.R. 4710.3-2. Decrease or eliminate livestock grazing in HMAs pursuant to 43 C.F.R. 4710.5(a). A decrease in livestock grazing would preserve the BLM's multiple use mandate while also fulfilling the agency's mandate to preserve and protect wild horses and burros.
Western Watersheds Project would like to propose that the Black Mountain, Gray Hills, and Butler Mountain allotments be closed to sheep grazing without any conversion to cattle or other livestock use due to concerns about domestic sheep/bighorn sheep interactions and the disease risk this poses. Instruction memorandum 98-140 and WAFWA recommend a 9-mile separation between bighorn and domestic sheep and IM-98-140 actually mandates this separation for desert bighorn sheep. These 3 allotments are well within the 9-mile buffer area and portions of the allotments are within occupied bighorn sheep habitat. Sheep grazing needs to be expeditiously phased out on these allotments.
The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock-- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage--grouse habitats of the ACEC.
The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage--grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage--grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage--grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts.
Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage--grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage--grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations.
Loss of this PMU would further isolate sage--grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse.

Table C-14
Livestock Grazing

These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified.

The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts

The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.

Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long--term Viability for Sage--grouse and Other Sagebrush--dependent Species.

Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking.

These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations.

Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery.

Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change

In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area.

Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied.

Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs.

Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery.

Table C-14
Livestock Grazing

These are public lands which means I have just as much say in the use of the lands as do the ranchers. Most Americans want our wild horses and burros protected and allowed to live on our public lands. It is time that ranchers had to pay for land at a level that other Americans have to pay when they want to use land. If a reasonable fee were charged to ranchers, then they would not be so determined to use our public lands and they might find other land to use. In a market economy they should pay a market rate and if that is not affordable to them, then they should turn elsewhere for a sustainable living. So either we have a market economy or we don't. Everyone wants a market economy until it affects them. You must start doing your job and protect our wild horses and burros as is the law. Start representing the people and not the ranchers as greed should not be your motivater.
4. ISSUE: Yearlong livestock grazing in the arid cold desert environment continues. In some of the most fragile areas of the district, where rainfall is most scant and summer temperatures high, yearlong grazing is allowed. In theory, allotment management plans call for livestock to be rotated through pastures within the allotment during the year. While yearlong grazing may be sustainable in Montana and Wyoming at lower elevations due to rainfall and especially summer precipitation that creates plant re-growth in late summer, it is not in Nevada. This is especially true where cattle now graze rather than domestic sheep for the reasons stated in issues related to sage grouse.
6) Stewardship Contracting. The CCDO had opportunities to implement stewardship contracts on the ranches that have been acquired (For example: Washoe Valley and in Carson along Carson River) however, failed to do so. These ranches could have been excellent examples of stewardship contracting for the CCDO and the BLM as a whole. Trading the goods (grazing the grass) in exchange for services (such as fence repair, irrigation, ect) could have lead to showcases for the BLM. I would suggest that those be a priority in this planning process.

ISSUE 11: RECREATION AND VISITOR SERVICES

Table C-15
Recreation and Visitor Services

Recreation (including SRMAs)
Permitted and Competitive events should be planned for in the RMP. In anticipation of Special Recreation Permit requirements for organized recreation activities - as well as to streamline the permitting process for mountain bike events, rock-crawling events, ATV Jamborees and off highway motorcycle races - BRC suggests the CCDO consider developing an Alternative that would evaluate certain routes/areas for competitive and permitted events. It would provide a public benefit to all trail users, both motorized and non-motorized, to approve routes for permitted events in the programmatic travel planning process. We also believe this would benefit the agency by helping to reduce the future workload when processing permit applications.
D. Management plan needs to include the pre-authorization/approval to do mechanical maintenance of the trail system. Al. Management plan also needs a process for replacing routes that from time to time may need to be retired so as to maintain a total mileage of trails. Am. Needs to partner with local enthusiasts groups. An. This should also include the pre-authorization/approval of holding special recreation events. Xix. Needs to differentiate between impact of racing events and dual sport or poker runs. Most any open road or trail should be considered for holding dual sport rides/poker runs

Table C-15
Recreation and Visitor Services

Executive Order 13443, "Facilitation of Hunting Heritage and Wildlife Conservation", issued in 2006, directed the Department of the Interior and its component agencies, bureaus and offices "to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat." The Order called for a comprehensive 10-year Recreational Hunting and Wildlife Conservation Plan that would set forth an agenda for implementing the actions called for in the Order. The ten-year action plan was issued in December, 2008. Among its recommendations that address recreational shooting: "...incorporate hunting and recreational shooting into federal agency's planning processes; Revise BLM/USDA Forest Service management plans to designate shooting areas; Incorporate opportunities for hunting and recreational shooting into public land management, planning, and decision-making.

Specifically, consider integrating hunting and recreational shooting opportunities in all federal agency plans for travel management, land management, analyses under the National Environmental Policy Act (NEPA), and related road closures and other access limitations; ensuring that hunting and recreational shooting opportunities are a priority."
BLM Instruction Memorandum IM 2006-006, details the process of implementing E.O. 13443. and provides a link to the Order. The IM can be accessed on the web at:
http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/20080/im_2008-006.html

Consequently, the BLM should include areas that are applicable for development of supervised and unsupervised shooting areas and ranges and ensure that all areas are open for hunting access

ACCESS / TRANSPORTATION
1. ISSUE: The exponential increase of miles of new OHV tracks have and are becoming trails which quickly become roads that cause resource damage
There has been an exponential increase in the miles of OHV track roads across the CCDO, but especially near urban areas. It takes only a few passes of a small OHV to create a visible track. More OHV users follow these tracks and an established trail is created. Many of these trails are then driven by jeeps and other larger off road vehicles. During a recent attempt at an inventory of trails / roads in one area of the CCDO, the increase was so rapid, the inventory couldn't keep pace. Many game species reproductive sites have roads to and through these which allows disturbance. Roads bring predators that affect species like sage grouse, fragment many types of wildlife habitat to where species diversity is affected. Non-engineered roads spread noxious weeds, cause soil loss and can drain wet meadows. Numerous crossing, parallel tracks and roads and a gridded, web-like effect decrease the aesthetic experience of being on undeveloped public land areas.

ENERGY (Wind, Solar, Geothermal)
2. ISSUE: The designated utility corridor along Heybourne Road that would carry the Blackhawk to Heybourne power line cuts through subdivisions that weren't on the books when the corridor was designed in the old RMP
Although the Blackhawk to Heybourne power line has been put on hold at the request of NV Energy, the utility corridor that would house this power line and others still exists. When the corridor was designated, none of the subdivisions it passes through were built - most weren't on the books. These now exist. Whenever a line is constructed as it eventually will be in the corridor, it will lower property values. Existing small power lines in this corridor have caused prime building lots in Saratoga Springs to remain unsold- even during the development boom years of the early 2000's. Retaining this utility corridor which will allow construction of a line like the Blackhawk will create an OHV circuit through residential areas that doesn't currently exist, will impact a federally listed species habitat and may create health hazards.

Table C-15
Recreation and Visitor Services

RECREATION / OHV (Hunting, Fishing, Hiking, Biking etc)
6. ISSUE: OHV track / trail mileage has increased exponentially, creating a web of trails, tracks and roads
There has been an exponential increase in miles of OHV tracks / trails. In the lower west Pine Nut range, OHV tracks can be found on and in nearly every ridge and drainage, and on many hills. Many hills have parallel OHV trails on them, located just a few yards apart. The Sunrise Pass road now has a deep OHV trail paralleling it that didn't exist just a couple of years ago. Each OHV rider wants to ride in virgin country, blazing their own trail. The definition of "access" for many OHV users means cutting a new trail every time they're out. Every spring site in the Pine Nuts has at least an OHV trail to it which allows disturbance for deer fawn rearing and sage grouse brooding. Trails fragment many types of wildlife habitat which affects species diversity and help spread noxious weeds. Trails allow soil erosion to occur which eventually turn the trails into deep cuts that are impassible -creating a reason to make new OHV trails. During a recent attempt at an inventory of tracks / trails / roads in one area of the CCDO, the increase was so rapid, the inventory couldn't keep pace. It's nearly impossible to write effective regulations limiting OHV use to existing trails because new ones are created every day and are "existing" by nightfall. The problem has become especially bad since the USFS in California and part of Nevada closed its road system to OHV use except where posted open. The CCDO with specific areas like the Pine Nut Range is receiving unprecedented use from riders blocked from USFS lands

11. ISSUE: When on the District, BLM law enforcement spends nearly all of its time at Sand Mountain; most of the District never sees an LEO
Sand Mountain takes a lot of law enforcement resources because of the number of people using that resource in a confined area. BLM law enforcement focuses most of its attention in that area. Due to the issue discussed previously, the remainder of the District rarely if ever sees an LEO patrol

Recreation
7-e. ISSUE: The proposed Conservation Measures fail to address impacts of individual OHV trails and subsequent two-track roads that impact sage grouse and sage grouse habitat.
Discrete anthropogenic disturbance via highways and gravel roads has been identified as an important issue for sage grouse habitat in the Conservation Measures. Overall objectives talk about limiting roads and specific objectives talk to limiting road disturbance to 3%. The Conservation Measures overlook the impact of OHV trails left by individuals using public and USFS administered lands. Are these really to be categorized in the Measures as diffuse disturbances, along with livestock grazing? Individual user OHV trails mechanically damage sagebrush, disturb nesting and brooding, destroy riparian vegetation and drain wet areas through capillary action. In low-mid elevation areas, OHV trails lace and grid every drainage and ridgeline. Many of these trails become roads. Low elevation lands are a dirt trail / road web of fragmented, small polygon areas that can't function as sage grouse habitat. Nearly every low-mid elevation riparian area in Nevada potentially used by sage grouse for brooding is impacted by individual use OHV trails on BLM lands. Individual OHV trail / roads systems force the issue of discussion on patch size. The case can't be made that webs of OHV trails and two-track roads don't impact sage grouse and sage grouse habitat no matter which label, discrete or diffuse, these fall under. This issue must be addressed specifically for sage grouse.

The Bureau of Land Management is a member of the Federal Lands Hunting and Shooting Sports Roundtable. This national group was created by a memorandum of understanding signed by three federal agencies (including the BLM) and 40- non-governmental organizations to address issues and opportunities associated with hunting and recreational shooting on public lands and national forests. Materials developed from this roundtable should be incorporated into your proposal.

Table C-15
Recreation and Visitor Services

Permitted and Competitive events should be planned for in the RMP. In anticipation of Special Recreation Permit requirements for organized recreation activities - as well as to streamline the permitting process for mountain bike events, rock-crawling events, ATV Jamborees and off highway motorcycle races - BRC suggests the CCDO consider developing an Alternative that would evaluate certain routes/areas for competitive and permitted events. It would provide a public benefit to all trail users, both motorized and non-motorized, to approve routes for permitted events in the programmatic travel planning process. We also believe this would benefit the agency by helping to reduce the future workload when processing permit applications.
Dear folks of the BLM. Keep our lands open to hunting and shooting ..Remember you work for us .
BLM planning must recognize and address the need for the "Open" designation where appropriate. There are areas that have long been used for cross-country OHV activities, with no adverse environmental impacts, such as the Hungry Valley/Moon Rock "play areas." Some open areas are recognized for their high OHV popularity and should be kept available for those who value this type of recreation. Other examples of valued "open" designated areas are: dry lake beds, staging areas that provide recreationists to gather before and after traveling on OHV trails and "Tot Lots" where children and young adults can recreate with their friends in an area close to parental supervision. Some OHV events, such as trials competitions, require the "open" designation to be viable. Staging areas for competitive and other commercial events are another example. The Planning Team is cautioned not to segregate users who value the "open" designation into smaller and smaller areas. Crowding users who require the "open" areas can increase safety risks to the public as increasing numbers of OHV enthusiasts are compacted into ever-smaller areas.
This is assinine! This state is largley populated by hunters, fishers, and outdoor enthusiasts and without access to to the trails, shooting areas and other portions of the state it will restrict everyone to main routes depriving individuals of OUR right to enjoy this bountiful land. By doing this it will make the many beautiful features of this state dormant. This should be stopped immediatly!
I am a citizen of Nevada (Clark County) and am aware that BLM is undergoing analyzation of many area of Nevada for potential change in use. I would strongly like to urge you to consider not further restricting any areas from hunting and recreational shooting. In the past many years, the amount of areas taken off limits for these activities have been quite large and I am concerned about any further restrictions of BLM land for these activities. Please consider this carefully. Thanks.
Our family actively rides trails in the region and we whole heartedly support expanding capacity to include Sparks. It would definitely be an economic benefit for the community as riders spend more money in the areas they ride.
Access is not just for recreation We feel it is important to recognize that public access to these lands is not merely for recreational purposes alone, and restricting or confining public access to areas that suit only recreational purposes does not serve the public's interest. Since the area is already extensively covered by existing routes, these road resources contribute tremendous value to the area by making so much more of it accessible to people of all ages and diverse physical abilities -as long as they remain open to motorized vehicles and accessible under the "limited" designation to protect the resources.
I am writing to express my support for continued access on BLM lands for recreational shooting. As an avid shooting enthusiast, I have decided to voice my support for continued access on BLM lands for recreational shooting because my first experiences learning how to responsibly handle firearms took place on BLM land in your district.

Table C-15
Recreation and Visitor Services

As a young man, I had few opportunities to gain experience with firearms in my hometown in California, mostly because of a lack of places to practice my gun handling skills. It was only on my summer vacations visiting relatives in your district that I was able to learn gun safety and amateur marksmanship. These learning experiences took place on BLM lands where the low density of people and varied topography made for very safe and enjoyable shooting experiences. The western Nevada BLM lands in your district offer many areas that can be accessed and safely used for responsible amateur marksmanship. People such as myself enjoy the opportunity to visit your district's lands and make use of the fact that recreational shooting can easily be enjoyed at various undeveloped sites that are suitable for such purposes. This is an attraction that few areas in America have to offer, and sportsmen like myself make it a point to visit these lands in order to enjoy the sport of amateur marksmanship in a safe environment.
Some people misconceive recreational marksmen as being bent on making a mess and degrading natural features by using them as targets. I cannot deny that there are individuals who lack responsibility and do not show respect for the land that they make use of. However, as I am sure that many people who work in your district may attest, closing off areas to recreational shooting only hurts the people who were responsible users of that land in the first place. It is disappointing to hear about BLM closures to recreational shooting, because I know that the problems caused by the few "bad apples" in the community of recreational marksmen will not be stopped. Unfortunately, these individuals will continue to disregard the law and act irresponsibly despite any closures by your district, especially since the vast nature of your district makes enforcement of any closure a difficult task. The only people who will stop visiting your district's lands and contributing to the local economy will be responsible marksmen like myself.
The BLM should formulate a pro-recreation alternative. Such an alternative should not substantially reduce the opportunity for OHV recreation. There is an increasing demand for OHV recreation opportunities on public lands and National Forests. BLM's OHV Strategy states, "Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management (BLM) has increased substantially in recent years. At least one Alternative should seek to meet the need to provide for the documented increase in the popularity of motorized recreation experiences. I strongly oppose being presented with a "range" of management alternatives, all of which represent significant reduction in OHV and other recreation opportunities.
I am also aware of some changes that have been enacted in other areas, to either close areas entirely to public access and usage, or to restrict/change their historical usages. When considering any changes to the Carson City District Management Plan I would encourage your consideration to maintaining the maximum possible public access to these public lands. Our ability to recreate on open areas diminish every year and some of the few lands that do remain open have become overly restricted or unavailable to the average person because of the lack of access by surrounding private lands or limited access with few published entry points, not to mention entry points that are too difficult to locate. I strongly support and urge your planning processes to consider keeping these public lands open and accessible to their traditional and historic uses of hunting and recreational shooting.
I'm writing to comment on the Carson City District Office RMP revision. I live and recreate in Northern Nevada, on foot, by 4WD and motorcycle. Below are my points and comments regarding the RMP revision.
F. SRMAs need to be viewed as "trailheads" for back county and adventure touring into the greater Nevada outback. As. These SRMAs want to be seen as keystones in a state wide recreation and travel management plan. At. These SRMAs want to tie into the plans the State and Counties of Nevada have to build local economies by increasing OHV tourism. Au. These areas should be defined to include as much area as possible to avoid the problems that come from high user density. G. Needs to partner with local groups that are willing to adopt the SRMAs.

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4. Environmental Issues A. Sage Grouse is the 800 pound gorilla. i. The spotted owl and desert tortoise has taught us that prohibiting human activity does not solve the problem. 1. Closing off areas to preserve spotted owl/desert tortoise habitat has not brought about a recovery of species population 2. Closing off areas has taught us pressure on the endangered species is coming from threats that have nothing to do with human activity. A. Increase in barn owl populations are biggest threat to spotted owls. B. Ravens and other predators are biggest threat to desert tortoises. Ii. Fortunately OHV is at the bottom of the scale for threats to the sage grouse. 3. Doesn't require area closures. 4. Can be managed by re-routing of existing roads and trails 5. Can be managed by seasonal closures. Iii. OHV enthusiasts are ready to partner in any activity that helps improve sage grouse habitat.
I feet that unless it truly is vital that SOME sensitive areas be closed, that all BLM land should available for use for hunting and recreational shooting.I took my son hunting for the first time last year and he truly enjoyed the experience. I feel that it is important to have choices AVAILABLE to be able to got hunting. By limiting the areas accessible it forces hunters and recreational shooters into increasingly smaller and smaller spaces. The decision to do just that would increase the likelihood of accidents. I would also hope that my son's children and grandchildren would continue to be able to share the same experiences that my son and I have.
The revised RMP must keep the lands managed by Carson City district office open to hunting recreational shooting, and motorized recreational vehicles
Please consider during the course of your revising the Resource Management Plan for the Carson district the impact your decisions will have on hunting, fishing and ATV usage. The vast amount of BLM land available for these sports is of great importance to many Nevadans and has a direct impact on the local economies. Some western states like Montana and Wyoming either have or are proposing state constitutional amendments ensuring the everlasting constitutional right to hunt and fish in their states. Please ensure that Nevadans continue to be able to pursue their sports without undue limitations and restrictions. We are fortunate to have a lot of public land that people can use, lets keep it that way and not become like Texas which has little or no public land people can use.
I am a young American who enjoys the sport of Shooting. I utilize Public Lands consistently and almost exclusively for my recreational shooting needs. I have heard about proposed changes that may threaten one of the few reasons that I came to Nevada. While I do use BLM Land for Hiking and potentially Mining in the future, at this time my usage of the Land is primarily for shooting. I cannot afford the 15-20 Dollars in gas in order to make a trip down to Carson to use the Unsafe and Crowded Public Range.
Recreational shooting (target shooting) is one of many activities that the Bureau of Land Management (BLM) may allow on public lands as part of its discretion to manage for multiple uses. In accordance with the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM typically manages a wide range of multiple use activities on most public lands provided that they that do not impair the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, and archaeological values, and that they do not endanger human health, safety, or property.
I do not litter on BLM Land. I consistently clean up empty brass and scrap glass and lead when I use the lands. I know I speak for others who act and use the area responsibly that we will continue to do so. So please keep the land open for all recreational uses, Shooting Included.

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One of the prime reasons I have for calling northern Nevada home is my intimate access to public lands. Further restrictions and micromanagement will not serve the public or preserve our lands. Further involvement in the use and care of public lands should be encouraged and nurtured in the public in general. Do not use BLM management of the public lands to drive a wedge between the people and their public lands. Educate and encourage people to use and enjoy this great county and we will all be stewards of the lands. Please let me know if you repair your glitches. I hope others trying to use these links were not frustrated as I was.
I see we had some secret meetings or meetings that were very poorly advertised. To use such to change land management to your advantage is wrong and unfair. We moved to BLM adjacent land to use such for recreation which includes riding, hunting and shooting. As a disabled veteran I use a quad to get out on the land which I enjoy very much. Without a quad or side by side I am and will be unable to enjoy what I enjoy doing and what my family purchased this land and house for. It is unfair for you to take away the use of the land that I fought for in my service time,as without a means of transportation I will have no access.
We would like to express our support for the inclusion of more trails in the revision of the Resource Management Plan for the Carson City District. It is well documented that recreational trails provide significant social and economic benefits to an area such as ours. Providing mapped and signed trails assists in getting more people to experience the outdoors whether they are local residents or visiting here from out of state.
As the largest mountain bike organization in the region representing over 350 members, TAMBA would like to see the BLM consider the design and construction of mountain bike specific trails similar to what was done in the Sandy Ridge area of the Salem District in Oregon. The BLM staff there worked with the local mountain bike groups to create a riding area that is thoroughly enjoyed by locals and becoming a destination in itself.
Although our mission specifically involves non-motorized multi-use trails, due to the nature of the current use of many of the BLM areas in question, I am also compelled to support additional motorized trails. Mountain bikes and motorcycles can co-exist on trails as done in the Pine Nut Mountains area. The addition of motorized trails in appropriate areas reduces the congestion and poaching on trails closer to population centers that have more human powered use.
We would specifically like to support the inclusion of the Canoe Hill area trails into the plan revision. Although we do not condone the construction of social trails, there exists an opportunity here to work with a group of local riders to bring these trails up to recognized standards and include them into the system as an outdoor recreation opportunity right next to the City of Sparks.
I am a resident of the state of Nevada and a tax payer and registered voter. I am expressing my concern that I am against closing off or making it off limits to hunt or shoot on any Federal public land. (BLM) I hope that all residents are allowed to enjoy this great state.
Please stop taking our rights to own, carry, hunt, and shoot our legally owned firearms protected by the Constitution of these United States of America on Federally owned (Citizen Owned) lands!
Despite the Washoe County Sheriffs Department saying that they can afford to go over to the range, I am not given a company car in which to indulge my hobbies. I have not been given gas to fuel my company car so that I can indulge my hobby and I will not in the future be given either to endure the trek down to Carson in order to utilize a range being run with a wide variety of skill levels and safety measures (Meaning I will not subject myself to being potentially getting shot when an idiot sweeps the range).

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Presently, there is a need to develop trail based recreational resources within the Pah Rah Range and address the increasing user conflict. The official development of this trail system would contribute to goals established within plans published by the City of Sparks, Washoe County Regional Parks and Open Space, and State of Nevada with respect to establishing trails and promoting the preservation and use of open space. Further, these comments are congruent with BLM policy and procedure that prompts citizens to alert BLM of existing social trails and inform BLM about favorite places for recreation.
Myself & my family support all forms of recreational and special event use of public lands in the spirit of "multiple use" for the benefit of our citizens who own them .The multiple use mandate requires that OHV travel ,grazing ,mining & infrastructure improvements continue to be "prescribed uses" of public lands
As a member of Blue Ribbon Coalition ,the Pine Nut Mountains Trail Assoc. ,Save The public Trails ,CPA & HSMC I will tell you that we have needs for a wide variety of routes and terrain to continue to enjoy our most treasured and highly valued sport and lifestyle . Single track trails top my list by far. The majority of them should be narrow & challenging for the hardcore trail rider. Many of them should be moderately challenging for beginner to intermediate level riders .Sandwashes also make naturally occurring trails that suit everyone well. If we didn't want to be challenged we would stick to two track. 4X4 jeep roads & two track routes that ATV's 4X4's and side by side UTV's enjoy exploring the back country on are also of major importance . Each of the major use areas should have several "open" play areas for "hillclimbs" (we have horsepower hill at sand canyon road in the pine nuts for example) also the canyon and some of the low hills south of the staging area kiosk on Pinenut road that has a network of tight trails that would be best used as an open play area. I am sure the rock crawlers could use an open play area that contains the nescessary boulder piles to make some challenging runs for them.
There is also demand for a Motocross facility somewhat like the arrangement at Stead .Douglass county has expressed a desire to Manage such a track The City of Dayton has also expressed a desire for a track and already advertises out of state for OHV recreationists to "discover Dayton".Perhaps BLM can give The county a parcel off of Sunrise Pass rd. in an ammendment to the Douglas County Lands Bill a couple miles out from residential areas . The Pinenuts and other areas in the RMP are a major draw to the area and contribute to local jobs and our economy .Visitors buy gas, eat at our resturaunts ,sleep at our motels & hotels/casinos ,they buy parts & accessories, have repairs done & buy vehicles at our Motorsports dealers & independent shops.They have their trucks & RV's towed & repaired here
Amenities like toilets ,loading ramps ,dry camping & developed camping areas should be built . A system of routes that connect the individual "special recreation areas" of the Pine nuts ,Wilson Canyon ,Smith Valley, Desert Creek, Middlegate ,Sand Mountain ,Moonrocks ,Fort Sage ,Black Rock, Nightengale that would inter connect them to encourage travel throughout the state.
My concern in regards to your recent RMP scoping period is the socioeconomic impact on my business and its employees. I have not seen any comments or hard data in regards to the possible impact on local business that could be affected by a new RMP. A low estimate of OHV related businesses in the Reno/Carson/Minden area is in excess of 50. This translates into 100's of jobs and families dependent on OHV dollars. There needs to be data collected to determine the socioeconomic effects on these businesses.
I can tell you that 40% of our total company sales are attributed to local dirt bike riders and visitors to the Carson City District. I imagine this is true for other motorsports businesses in the region. The economic impacts of your decisions should be accurately disclosed in your "socio-economic analysis."

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OHV enthusiasts are often families, comprised of all skill levels from the most novice rider, to the highly skilled expert. They all share the need for places to ride and enough space to ride to keep them coming back for years to come. One of the main reasons they visit our area is the drastic reduction and elimination of OHV routs in other locations. As an example 70% of previously open OHV routes have been closed in the Eldorado National Forest, and over 800 miles of existing OHV routes have scheduled for closure in the Bridgeport Ranger District. Any proposed changes in the Carson District RMP that limit or impact OHV use will discourage visitors and locals from enjoying our beautiful area. A reduction in dollars spent on OHV recreation will negatively impacting my sales which may lead to lay-offs for my employees. This would be devastating to their livelihood and families financial security. It would also cause significant harm to Nevada's fragile economy.
The last few years have been especially difficult for Nevadans; we need to look at opportunities to bring people to the area, and not limiting their outdoor experience. If major restrictions and limits are imposed during the new RMP, this will discourage OHV tourists from coming. These missing dollars will greatly hurt ALL businesses in the region. Please develop RMP amendments that reflect these issues and keep OHV use at the forefront and a positive experience for generations to come.
I urge you to continue to allow unrestricted access to the BLM lands in your district for the purposes of recreational shooting. This type of policy will allow for Americans such as myself to continue to enjoy the sport of amateur marksmanship in one of the few places left where one can enjoy that sport without fear of breaking the law.
Currently, an eight (8) mile "social trail" exists on T20North R21East, sections 19, 30, and 31, which is adjacent Golden Eagle Regional Park (GERP), to the southwest. The GERP is operated by the City of sparks on land that is leased from the BLM through an R & PP lease. At the south end of GERP, the Pah Rah Trailhead has been established, and is recognized as a Washoe County Regional Parks and Open Space Trailhead. The CHTA has been working with the BLM by proposing to expand the Pah Rah Trailhead by conducting improvements on and expansion of the existing social trail network.
We would also like to see the Pine Nut Mountains designated as an OHV park under a special -recreation management area as well.
The CHTA remains committed to continued work with the BLM to protect the existing social trail and add additional new trail. It is hoped that these comments are added to the current RMP update process. These comments call for BLM lands (T20North R21East, sections 19, 30, and 31) to be identified within the update as a recreation corridor and potentially identified in a future R & PP lease as a natural, desert park that consists of open space and a trail network.
In your RMP planning, areas of great benefit for the off-road community need to be defined and protected for future generations to come. Two areas that you have already identified are the Pine Nut Mountains and the Hungry Valley/Moonrocks areas. Both of these areas have an extensive trail system already contained in them, they need to remain open and accessible for all. All the routes that are currently available are valuable, and none should be slated for closure in these areas. Any route that is deemed to be inside a "sensitive" area can be moved. These routes should be looked at in a case by case basis, but overall both of these areas (Pine Nuts and Hungry Valley) should remain as designated OHV areas. Also, The local OHV community can and will be extremely helpful in adopting routes in the district, therefore I ask the BLM to actively work to establish positive relationship with the OHV community.

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One aspect that I have not heard mentioned during this scoping period is the valve of "high skill" single track for the very experienced rider. Currently there are nearly 100+ miles of high skill single track in the Pine Nutt mountains, this single track should remain open as a draw to skilled/expert level riders. Those who possess expert level skill on a motorcycle are not content with riding easy, un-challenging routes. I volunteer now to work with the BLM to identify and maintain these routes. It is very important for the serious off-road rider to have numerous loop options of various mileage and difficulty for riding. Nobody wants to ride on roads or wide trails, and nobody wants to ride the same trail twice in a day. In other words, trails need to make a loop, not an out and back type of trail.
There should be several unrestricted off-road play areas identified in the RMP. Areas that could be used for such could be areas of sand dunes that typically boarder dry lake beds. One example could be the Smoke Creek desert.
Camping should not be restricted to designated areas. Part of the draw of our great area is to be able to camp wherever ever and whenever you wish. It would be a tragedy for this to ever be changed. It would be even worse if the day ever came where you had to pay to camp.
The general outdoor experience of Nevada should not be altered to appease some "green" group that does not live here and never ventures into our state. We love our Nevada lifestyle and will work to keep it as close to the same as it is today for future generations to come. Please note that the off-road community has put in more volunteer hours and dedication to conversation and clean up than all "environmentalist" groups combined. We are the ones who love the outdoors, we are the ones fighting to protect it and protect it for all to enjoy. Thanks for your time with this important matter and best regards,
Scoping Handout- 3.1 Recreation and Travel Managemeny and Soping Handout- 3.3 Recreation and Transportation Management FAQs I propose that all motorized vehicles be banned from off-road travel within any legal Herd Area (HA) land. I personally have even seen OHV hunters driving off-road within legally designated Wild Horse and Burro areas in search of something to shoot (guns visable). This is despicable in both the ethics of hunting and in the concept of range health. I supply you here with a photo of a recent OHV event on the Twin Peaks HMA as an example of OHV damage being done.
Prior to urban sprawl/expansion of the City of Sparks, these BLM lands were used in various ways (e.g., cattle grazing; equestrian; OHV usage, including 4X4s, motocross, ATVs; hunting and shooting; dumping; and non-motorized OHV usage, including hiking and mountain biking). However, due to an increase in population, the development of neighborhood communities as part of the expansion of the City of Sparks (e.g., Wingfield Springs), and establishment of the Golden Eagle Regional Park, access to the adjacent BLM lands has improved. As a result of improved access to these public lands, an increase in recreational activities by the general public, there is an overall increase in usage of these BLM lands. As such, land usage by the different user groups is now producing conflict due to competing activities (e.g., shooters vs. hikers). With the expansion of Sparks City limits and urbanization of bordering lands, historical usage of the land (i.e., hunting/shooting) in combination with present day usage (i.e., hiking, mountain biking, general exploration) creates safety issues. These comments concern a call for BLM to address the user conflict and safety issues that exists and is increasing (i.e., shooters vs. non shooters), identification of the lands for recreational purposes, and protect open space near urban development. Specifically, the intent of these comments is to prompt the BLM to consider these lands in the current RMP update as a recreation corridor.
I am writing to voice my opinion about closing BLM land to target shooters, while I will admit there are some that make a mess out there on these lands, there are also a lot more that are responsible and take out their trash and have respect for these areas. I hope that there can be some educational material published so that the general public can be more informed about this matter. I've been a target shooter for some 30 years and have always had a great appreciation to

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outdoor activities and enjoyed the freedom of outdoor target shooting.
I am a 54 year old retired building contractor and have recently moved to Gardnerville from Sonoma County, California because I did not like the change that took over the area. I am an avid outdoorsman and have bow hunted throughout Northern Nevada for many years. I live between Pine Nut Road and Fish Springs Road off of East Valley Road and currently enjoy being able to do most the same things I could when I was younger. I have become very familiar with the roads and trails including the single tracks in the Pine Nut Mountains. My use for the area includes: ATV 4 wheelers, dirt bike/motocross, mountain biking, hiking, camping, and metal detecting. I have 48 years' experience in motocross/trail riding and have competed in mountain biking competition. Following is a list of my issues and concerns for the Pine Nut Mountain area including what I would like to see done.
1) The amount of garbage, trash, beer cans/bottles, old cars, old couches, shot up TV's/computers, etc. that I come across really annoys me. I collect all I can when on the ATV and have yet to catch any of these litterers. More signs need to be posted, with heavy fines stated, and more BLM/Police Department involvement. Signs need to be posted where the pavement hits the dirt on all roads into the Pine Nuts and especially by the dump. The local police, who are good at collecting revenue from innocent people going 2 miles over the speed limit or rolling through a stop sign, need to spend more of their time in the Pine Nuts catching these litterers and fining them $500 to $1000 each plus mandatory clean-up. This would put an end to the littering. The dump located at the Pine Nut Road needs better containment of wind driven garbage. I have ridden by there on windy days and have seen 1000's of plastic bags blown all over the hills along Pine Nut Road next to the dump. Spring clean-up, bin donations from the Refuse/Dump center, and local involvement will all help to clean up the Pine Nuts.
3) Respect the wishes of the Indian Tribe's gated fenced property on Stockyard Road and do not trespass. An Indian named Leroy lives there and respects the people that use the lands outside of his fence. There are roads around his property to enjoy the mountain. Staying off his tribal property keeps everyone happy. Signs would help to eliminate confrontations.
4) New OHV staging area somewhere between/end of Stephanie and Johnson roads with toilet, an ATV/bike off-loading area, and a post board would be nice for the people at that end of the valley. The Single Tree staging area at Pine Nut Road past the dump needs a toilet and ATV/bike off-loading area. A basic pit toilet would work mainly for all the women that ride mountain bikes in this area. The ATV/bike off load can be made with railroad ties and fill so a truck can back up to it and roll their ATV/bike straight out. Many ATV/bike riders are killed just loading and unloading into their pickups using unsecured ramps. I have a backhoe and would donate my time to help out. This basin riding area needs to be limited to ATV's, motorcycles, mountain bikers, and hiking only (no jeeps, pickups, sand rails, etc.)
5) The staging/camping area just north of the dump on Pine Nut Road needs to be dedicated to the new and learning riders of ATV's, motorcycles, bicycles only. It is a great place for the younger kids to learn and has a track setup to ride on. This staging area also needs a toilet and unloading dock along with a post board. Again, I will offer my services to get this done.
6) Shooting, I have seen it all over from top of Mount Siegel to across from the gun range by the dump on Pine Nut Road. What can I say; I shoot myself but prefer the gun range for a measly $2.00 donation and the entertainment I always get there. If I do shoot elsewhere I always clean up my targets, cans, etc. Leaving these items would be considered littering and punishable by fines. Should there be postings?
7) There are plenty of trails, roads, and single tracks throughout the Pine Nuts of which none need to be closed. 4 Wheelers, ATV's, motorcycles, and mountain bikers need to stay on these routes and enjoy them and refrain from any off trail use. Horse riders and hikers should have full use of the BLM Pine Nuts and not be limited to trails. Postings at staging areas?

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We would like to also see area-wide EA's for areas previously utilized for racing activities. OHV activities provide for strong economic impacts in neighboring communities and we think this should be considered in land use plans and decision making processes. The City of Yerington is also working on a multi-use property acquisition to include OHV recreation and the adjacent areas should be designated as a SRMA.
In summary, for over 3 years now, my wife, sons, daughters, visiting friends, my dog, and I have enjoyed my backyard called the Pine Nut Mountains and what they have to offer. I very seldom run across other people on my ventures but if I do I know they are there for the same reason I am, to enjoy. If you have any questions, comments, or need help, please email or call me at 707-495-5074.
While we support the special recreation management area concept, we don't want to be prohibited from applying for a special recreation permits in areas outside of an OHV area. Developing travel management plans in conjunction with the BLM will hopefully provide for a streamlined permitting process easing the process for both the agency and sponsoring club.
I want to state that the BLM lands in this district as well as the rest of the State are very important to me as a outdoorsman. I enjoy Hunting, Fishing and Shooting in these areas and do not want to loose this. I am asking that BLM to specifically address the importance of Hunting and Shooting on federal lands and how the revised RMP must keep the lands managed by the Carson City District office open to Hunting and Shooting.
I appreciate the opportunity to participate in the planning process of the resource management plan. I have no problem with recreational hunting, if the population is sustainable.
First some personal history of my own: I am a retired peace officer with over 34 years of experience with a rather large sheriff's department in California. I am now a resident of northern Nevada and have been for the last several years. One of my primary reasons for moving to Nevada was that it was a firearm friendly state. I also appreciated the abundance of federal land which is open to public use. I am a user of said lands and have been for most of my life. I have passed on that characteristic to my children and grand children. We all enjoy the open outdoors of the western United States.
I believe that most everyone who accesses public lands for recreational purposes does so with their own interests in mind. Sometimes, I think, certain groups/people forget about others who also recreate on public lands but not for the same reasons. Personally speaking, my family and I utilize public lands for three main reasons: 1. A place to legally hunt, 2. A place to legally and safely shoot our firearms, 3. A place to fish. Obviously, we hike and camp. Hiking and camping fit in to the experience of at least two of our uses.
I understand that many people don't share our pastimes and would like to see them greatly reduced or non-existent on public lands, period. I do feel bad for those folks. As I stated, I have been a participator in public land access for a long time, and I cannot remember a single time when safe target shooting or legal hunting has conflicted with anyone else using the land for their purposes.. I think that many people just don't like hunting and shooting of firearms, so they would like to see those activities end. Again, I feel bad for those people, instead of embracing other people and their interests they would like only their interests to be given merit.
To the point of this letter, please keep hunting and target shooting as a primary factor in developing the Carson City District RMP. Both are time honored traditions in America and I feel that they should remain so. I have a lot more to say on this topic, but I'll stop for now.
Please address hunting and recreational shooting in a positive manner in the Carson City RMP, and, to the maximum extent possible, please keep public lands open for hunting, offroad recreational use allowed, and recreational shooting encouraged.

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As part of this RMP revision, we would like the BLM to consider the following: Off-road desert racing has been a part of Nevada's heritage and we would like to see designated special recreation management areas for the Moon Rocks OHV area. Also an increase in this OHV boundary to include the Dog Skins mountains and south to the Sun Valley / Golden Valley areas.
As hunters, fisherman, campers, and naturalists, we are interested in access to all of our activities that we have enjoyed on our public lands for generations. The management of our public lands should not be guided by political and idiological policy, but rather by considerations that the residents most intimate with the areas in question should carry the most weight.
8) BLM involvement should include Alti-Alpina bicycle club, local bicycle and motorcycle shops, 4 wheeler clubs, hiking clubs, horse riding clubs, and local newspaper regarding calendared events, improvements, work parties, and getting the news out. More awareness will get more people involved in the enjoyment of what we have in our backyard! Also, more local police/BLM involvement regarding littering, squatters, suspicious activities, etc. (yes, I have seen some suspicious activities back in those hills). A hot line phone number on all sign postings would be a suggestion.
Backcountry dry camping should be continued.
E. SRMAs should be created in the: ao. Hungry Valley/Moon Rocks extending north to the Oregon border and west to the US 395 corridor and east along the Pyramid Highway and Black Rock Desert. Ap. Virginia City area north to I80, east to Alt US 95 and South to US 50. aq. Pine Nut Mountains north to US 50, east to Alt US 95 and south to the Sweetwater Mountains. Ar. Wilson Canyon xx. The area just north of the Walker River could provide opportunity for open riding area
I would like to voice my opinion on the BLM's grab and misuse of public land. Simply put, stay out of our business! In rural Nevada, the public land is sacred to us. We spend all of our free time roaming about hunting, fishing and exploring. To restrict our ability to use this land is ridiculous. I am a fifth generation Nevadan and will not stand for this. I run an outfitter business and preach conservation to my clients and family. I am educated and understand the issues well. You need to step back, look at public comment and do what we want. It is our land and our culture that you are taking away. You think by piling restriction after restriction and creating wilderness areas one at a time, you can keep us off our own land.
I am petioning the BLM board by requesting that the existing rule be modified to allow competitive motorized events at SM Neveda Recreational Area.
Pleas do not further restrict shooting on BLM lands, there is such a majority of government controlled land in Nevada it would cause immeasurable hardship on some of our favorite outdoor activities.
The BLM is a multiple-use agency and among many activities, hunting and recreational shooting are - and must be - allowed. However, in recent years, you have been systematically closing large areas of public lands to recreational shooting. Please do NOT adopt even more lands. Please do NOT further degrade hunting/shooting on public lands.

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The upcoming RMP should reflect the very active, multiple use outdoor recreation that the local community enjoys and needs for its economic well-being. I and my wife hike, mountain bike, ride horses, ride OHV's, target shoot, and camp throughout the back county of western Nevada. With overall backcountry use increasing, ANY area/road/trail closures result in over consentration issues and user conflict.
The RMP needs to have a strong pro OHV component to reflect the very large number of users. All existing roads and trails should be included in the official inventory. Single track trails, small two track roads and large access roads are all important while serving different needs. All routes should be considered open unless posted closed. Routes through sensitive/cultural/etc. areas should be reroutes whenever possible instead of closed. All sandwashes should be includes as multiple use routes. Open riding areas should be included. Rout designations ought to be continued and expanded with difficulty ratings.
Different trail difficulty levels add tremendously to the individual OHV experience. Beginners need smoother, easier trails, while more advanced riders/drivers prefer more difficult, more challenging routes. Periodic trail maintenance would keep some trails more beginner friendly. Utilize local voluntary manpower. Trail maps showing trail/road location and difficulty are very useful for the public and for emergency operations.
The Toiyabe Chapter of the Sierra Club has long been interested in wilderness possibilities in the Carson City BLM areas. The Club has led many trips to the seven Wilderness Study Areas in Nevada, all of which, in whole or in part, are worthy of inclusion in the National Wilderness System. We therefore request that these WSA's be maintained in such a way that their wilderness characteristics are not destroyed until necessary legislation can be passed.
The Pine Nut Mountains and Moonrocks area should be designates as Special Recreation Areas.
The wildlife in this district is abundant--pronghorn, sage grouse, birds of prey, lizards, snakes, and other small creatures and needs special attention. Unfortunately, the areas closest to Reno have been overrun by unwise ORV use and used as garbage dumps by those who do not care about the land. This needs to be addressed immediately. On more than one occasion, I have been walking with my dog in the Virginia Range and have had shooters fire very close to me. Since we have a shooting range provided at the base of the range, there is no excuse for this behavior and it needs to be stopped.
User conflict can be lessoned by separate user group areas and trails. Some non motorized areas/trails can be kept separate for equestrians, mt. bikes, and hiking. Equestrian staging areas have specific requirements.
Separate, designated shooting areas would increase safety and comport for all other users.
Partnering with local user groups should be encouraged.
9. There is a need to provide for commercial motorized tour operators. Yet another popular activity that is expected to grow, motorcycle and ATV tour operators provide a needed service and economic benefit to adjacent communities. Similar to our recommendations regarding permitted and competitive events, we strongly encourage the BLM to consider evaluating commercial activities, as much as possible, within the programmatic land use plan, thereby streamlining the permitting process and reducing staff workload.

Table C-15
Recreation and Visitor Services

To Whom It May Concern,

Marinating accessible trials for OHV use is vital to the quality of life for many Nevadans. For me and my friends, it's a singular reason for coming to the Great Basin, We purchase vehicles here, supporting local businesses, and we always take precautions to minimize our impact on the areas we ride.

By and large, riders of dirt bikes and quads are very responsible users of our public lands, and sticking to established trails is a strong part of the ethic. Note that many of these trails are in GPS maps, and are often the only way to reach points of interest. Already, most sensitive areas are off limits.

Instead of additional blanket closures, we believe that BLM efforts would be better directed toward outreach and education on issues of fire prevention, noxious weeds, and "leave no trace" campaign; and of course, enforcement of existing regulations.

The names below are all users of public lands in Nevada and Northern California who urge you to keep these areas open to all. (57 names)

BLM was an active participant in assisting us develop the adopted Washoe County Regional Open Space & Natural Resource Management Plan. The Plan and its components address future trail access and corridors; recommended buffers for sensitive natural and cultural resources; future lands for acquisition; recreational,visual, scenic, and water resources. We request that this approved plan and its components be incorporated into the RMP where possible, especially when considering future R&PP properties, disposal lands and providing regional trail connectivity between BLM and Washoe County trail/park systems.

In particular, future plans for the Sun Valley Rim Trail and Canoe Hill Trail System, which are greatly desired by the public, are very dependent on cooperative participation by BLM and should be included in the RMP. If these trail corridors could be addressed with the Environmental Assessment associated with the RMP, it would greatly assist Washoe County and our community partners on these projects. At minimum, if these important trail systems were included in the RMP for future accommodation, it would be greatly appreciated by our agency, our partners, and for future generations. We recommend that T20 R21 S19, 30, 31; T19 R21 S5, 6, 7, 8 be retained to accommodate the Canoe Hill Trail System or possible considered for R&PP designations. This is near a sensitive cultural area, but is in great need for managed recreation to reduce current user conflicts and on-going safety issues with congested area shooting and recreation participants.

Recreation:The Carson City District (CCD) recreation program is very important to the densely populated areas in Western Nevada as well as to more rural areas. The RMP should address urban interface issues as more and more citizens take advantage of recreation on public lands, with the attendant impacts on wildlife habitat, fire and public safety, and other resources. Recreation permits should not be issued or should be revised to include seasonal restrictions to protect critical wildlife habitat areas or seasonal uses, such as Sage Grouse leks and nesting areas.

Events should be continued with large similar type areas NEPA cleared.
Events in previously used areas and on existing roads and trails could have a simplified application process.

Table C-15
Recreation and Visitor Services

The BLM is a multiple-use agency and among many activities, hunting and recreational shooting are allowed. However, in recent years, the agency has been systematically closing large areas of public lands to recreational shooting. I dont believe I understand this effort. These are public lands. Why this effort to disallow hunting and shooting in such a large BLM area ? What is the goal here? I see no stated objective. As such, I disagree with this effort to limit or disallow hunting and shooting on these or any BLM public lands.
BLM cannot possibly say that this demolition of our public land is within their range health management. This is utter and complete destruction of the range. BLM cannot possible say that Wild Horses and Burros or any wildlife are causing destruction of the range when this damage is allowed and encouraged on our public land. All motorized OHV must be banned from all HA land. This approved OHV action is a deceptive and dishonest representation of range health management by the BLM. Any intelligent human can see that this kind of motorized OHV activity detrimentally effects the soil, the air, the water shed, the visual resources, and any fish or wildlife that have access to the area not only during the OHV activity but also after the activity ends. This must be stopped.
1. Suggestions for continued recreation use on BLM land: a. Camping needs to be free and permissible to camp in many open areas. B. Two track needs to be open and designated with a trail system c. Technical single track needs to be defined and open with a trail system, specifically for 2-wheel bikes (bicycle or motorcycle) d. Designated Trailheads there are many staging areas that are not defined and could really help educate and inform local and foreign use of trail systems
2. Suggestions for citizen stewardship: a. Public involvement- there needs to be a low cost way of informing the citizens of ways to participate in stewardship i. US Forest Service has billboards on 395 "stay on the trails" Another approach could be for the USFS & BLM to partner and encourage activation of local stewards. 'Good Citizen award goes to:' or 'Get involved in your OHV community through these steward groups' (list out local bicycle clubs, OHV, Horseback riding, etc) so people have a connection to their interest
Trail system -having a trail system would really improve the outdoor experience as you would know what is out there, where you can safely go and proceed, one way or two way traffic and how to get out if someone gets hurt. i. Citizens/businesses have created these over many years of use -give them an opportunity to maintain/improve/build trail systems. There are some really neat things going on in others states to model from.
I do not want any more restrictions on any type of public recreation, including those caused by wilderness. I want better access to our public lands.
Access/Transportation Maintaining the current system of routes and access points is of paramount importance to the continued use of our public lands for recreational and economic purposes. The current system could be improved if additional 'single-track' routes were established.
As a resident of Wellington, NV and being a shooting enthusiast, I think that a shooting range in the Smith Valley area would be a beneficial recreational addition to the community. Finding a proper location to support this recreation type is key to maintaining community acceptance. Smith and Wellington, NV is a mix of residential and agricultural properties, surrounded by BLM and Forest Service managed public lands.

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There are many Smith and Wellington residence that would like to utilize "The old dump site" located at Section 4 1/4 of SW 1/4, Range 24 East, Township 11N as a shooting range for shotguns, small arms and archery. This property was previously a local landfill used from 1950's through 1992. Lyon County managed the property during that period. It has been fenced, gated and locked after it was covered over in 1992. Lawrence Smith and I met with Erik Pignata on April 20, 2012 at the BLM - Carson City Office to review a proposed usage and site visit of this property. Since the shooting enthusiasts located in the Smith Valley area are looking for topical land use, this site would be ideal. The area is level which will aid in the organizations reclamation plans. The property is isolated from residential properties and livestock areas and backed by a large portion of BLM property. Although this property has not been previously identified for disposal, it would be a good longterm use for the community in an accessible, yet isolated area. Thank you for considering this previously county used property for disposal during the RMP Process.
There are several areas in the district that were not included in the WSA process but that have wilderness characteristics such as size, solitude, and opportunities for primitive recreation. These include the Virginia Range, the Peterson Mts., the Pah Rah Range, Rowe and Lyon Peaks, and the Wassuks. We are looking forward to working with you to identify and map these areas while they still maintain their wilderness character.
OHV use needs to be protected as green energy seems to take over the best OHV locations and once the green energy projects are done they are no longer able to be used in a multiple use concept
A fully planned and developed system of interconnected Hubs and Spokes will form an intentional and integrated trail network that meets the experiential and access needs of a majority of trail users. If these experiential and access needs are proactively managed through system wide trail-planning incidents of conflict and resource degradation can be avoided. We ask that the RMP incorporate a comprehensive trail planning mechanism to work with local mountain bikers and develop an integrated trail network.
I am expressing great opposition to ANY closing of public land for hunting, or as has been done through "back door" proceedures with closing public lands to OHV use throughout Nevada, and the 212 Basin (Las Vegas Valley)! I am NOT a hunter, but that is NOT the issue here; I AM an American citizen, and ALL Americans have a Constitutional RIGHT to public lands!
As a 15 year Nevada resident, I wish to voice my strong support for keeping the public lands open to hunting and shooting in all areas of the state. Thank you for the opportunity to share my concern.
I strongly urge the blm to keep all areas open to hunting and shooting and other recreational activites.
We have been in contact and had meetings with the CHTA members over the years and share their perseverance and commitment to more non-motorized trails in all of Northern Nevada. These trail opportunities are desired by the majority of Northern Nevada residents, add to the quality of life we enjoy, and can help the BLM manage and preserve the lands we enjoy.
These are public lands. Only the most serious needs should limit public access and public use, and this includes motorized travel. The average citizen simply cannot travel the length and breadth of public lands on foot or by horse. Try asking your neighbors how many of them know how to ride or how much it costs to own or rent a horse for such use! Motorized access of some form is the ONLY access the vast majority of the public have to these areas.

Table C-15
Recreation and Visitor Services

Local hunters and shooters are the subject loosers resulting from planning process that erode public lands use. Please help protect and preserve what use now remain-- keep open and accessible these traditional and historic uses!
I have been a resident of Reno since 1959. When my husband was alive and I was able to walk long distances and to backpack, we spent a great deal of time in BLM lands in the Carson City District. I have visited all of Nevada WSA's on several different occasions and have been thrilled with the prospect of eventual wilderness in these outstanding areas. They certainly need to be managed so that there wilderness qualities are not impaired by development or rampant ORV use.
But there are also areas that were not classified as WSA's that have wilderness characteristics. These include the Virginia Range, the Peterson Mts., and the Pah Rah Range, all of which are very close to Reno and provide wilderness opportunities for both day hikes and short back packs. Tule Peak in the Virginia Range is beautiful, particularly when it is covered with snow.
Because OHV use is the largest use of public lands and provides the biggest economic impact on Nevada community's. I would like to see a large OHV open area set aside for OHV use . It needs to be over 40,000 acres and be able to be expanded.
I also want the RMP process to give clubs and organizations put together cleanups and trail maintenance. There also needs to be a process to install new trails. I grew up riding with my family since I was 3 years old and I believe that responsible recreation helps keep families together and close, keeps children out of trouble, and increases the activity of kids, which helps with the United States issues with Obesity. I am trusting the BLM will use this process to improve recreation and recreation permits and not to close the riding areas.
Following are my comments in connection to mostly ATVing with minor association to snowmobiling. Note that I have been an avid snowmobiler since January 2000 and ATVing since March 2010. I snowmobile in Nevada, California, Idaho and Utah. I have gone on ATV rides in Nevada, California, Idaho, Oregon and Utah.
1. KISS: Keep the final plan simple, easy to understand and easy to use for all BLM land users.
2. Have public education a top priority on the how, when and where to recreate in the total management area.
3. Final maps should be available on large paper maps as well as downloadable to popular GPS devices, like Garmin and Magellan. 4. Keep most of the same areas that are open today to OHV activity in the final plan. 5. Mapping of existing road should be done quickly and then allow all OHV groups at least 2 years to review and comment on the mapped (inventoried) roads.
6. Ensure that the OHV community does not come out on the losing end whenever there is a conflict with another BLM user. 7. Clearly define the consequences to OHV "Bad Apples". These are the people who give the OHV community a bad name and ammunition to the Anti-OHV groups who want to close as much of existing OHV areas to OHV activity. 8. Create an environment where responsible OHV recreationalist are responsible OHV BLM land users.

Table C-15
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Motorized recreation is a fast growing and important recreational use of federal public lands in Nevada. If such a use is to be allowed on the CCD, it must be restricted to designated trails and roads that have been carefully selected, and cross country travel must be prohibited. We also feel that competitive speed events do not belong on BLM public lands. Such events are destructive and disruptive to native ecosystems. Their sole purpose is to push the limits of man and machines. The racers pay little attention to their surroundings except as it pertains to their racing. Such events are best conducted on private lands with facilities established for this type of motorized use.
Maintain recreational shooting and Hunting thru out the entire management area. There has been nothing to warrant a change due to environmental impact or public safety. Thank You
I am sending this due to the fact that I am born and raised in the state of Nevada. Nevada is owned mostly be the federal government, and has always been open for public hunting. I do not believe that the federal government has the right to close any land owned by the people to public hunting or shooting, this is extreme take over by the government and is not right.
Travel Management: Managing vehicular use of public lands and avoiding, minimizing and mitigating adverse impacts of motor vehicles is a critical element of the RMP. While the Sierra Club strongly supports access to public lands, it also is concerned about the harmful effects of off-road travel, especially on erosion, riparian area conditions, the spread of invasive weeds, and impacts on Sage Grouse and other wildlife. Sierra Club members are both vehicular and non-vehicular users of the public lands. We urge the BLM to follow its travel management process to develop road and trail maps in the CCD through a public process. These routes should avoid or minimize destruction and fragmentation of wildlife habitats. Redundant or unneeded roads should be closed. Seasonal restrictions should be imposed to lessen impacts on Sage Grouse leks. We especially support signing roads and trails open, as the previous attempts to sign roads "closed" has simply resulted in the destruction of closed signs. Areas to be closed or restricted include core priority habitat areas for Sage Grouse and all habitat for threatened, endangered and sensitive species (TES) in the CCD. Presently, roads and trails appear adequate for the CCD area, but this may change in the future with increased population, increased unacceptable impacts, and the need for increased protection of the habitat of TES species.
I would like the RMP process to consider all trails open unless specifically marked closed or fenced off. If the trail wasn't accessed by the RMP process, then it shall be open without restrictions. If a trail or area needs to be closed because of environmental issues or concerns, then another area for recreation needs to be opened for new trials or area to ride recreation vehicles. If the process gets into categorizing trails for specific groups, the categorizing of these trails need to be done in the open and presented to all groups effected and allow these groups to comment and advice before implementation
Wilson Canyon needs an OHV corridor linking it with Smith Valley, possibly on Copper Belt Road. I would like to see Wilson Canyon designated as a Special Recreation Re with OHV use as a described use.
I have lived in Nevada for over 60 years and regularly access BLM administered lands when I hunt, fish, explore, and particularly, ride my motorcycle. I am concerned that the BLM will restrict my access to public lands. I have experienced restrictions by other federal agencies in other locations, i.e, the Forest Service. I have seen roads, not trails, shut down for no apparent reason and hope that the BLM will not restrict my access to the public lands I (and my father before me) have been able to access and enjoy. Please do not keep me off my own public lands. Thank you.
RESOURCE MANAGEMENT PLAN PROCESS While the RMP is concerned with 23 issues to be addressed by the RMP my comments will focus on Recreations and Travel Management. Recreation and travel on public lands is a vital part of the social and economic makeup of a Nevada lifestyle. From the Burning Man to the Virginia City Grand Prix the ability to recreate on public lands is key reason people and businesses move to northern Nevada.

Table C-15
Recreation and Visitor Services

COMMENTS

1. Social Issues - a Nevada Lifestyle

A. Finding recreational opportunities just out your backdoor is important to Nevadans. It is a reason we choose to live in Nevada. It is a reason we choose to stay in Nevada rather than seek more lucrative opportunity in the big city. Rather than spending the better part of a day commuting to and from places we can recreate we choose to live where we can recreate in our "back yards".

a. Motorized
  i. Backcountry touring
  ii. Rock Crawling
  iii. Dirt Biking
  iv. Adventure Touring
v. Racing
b. Mountain Biking
c. Horseback Riding
d. Hunting
e. Fishing
f. Camping

Table C-15
Recreation and Visitor Services

A high percentage of Nevadans own OHVs or horses. This is seen in the number of local businesses catering to equestrian or OHV enthusiasts and by the number of number of local clubs. A partial list of local clubs and enthusiasts groups includes:

i. Western States Racing Association
j. Motorcycle Racing Association of Northern Nevada
k. Valley Off Road Racing Association
l. Lassen MC
m. Tank Slappers MC
n. Trailblazers MC
o. Rim Benders MC
p. Dust Devils MC
q. High Sierra MC
r. Hills Angels 4x4
s. Reno 4x4 Club
t. Sierra Stompers 4x4
u. Pine Nut Mountains Trails Association
v. Coalition for Public Access
w. Alta Alpina Bicycle Club
x. Reno Wheelmen Bicycle Club
y. Back Country Horseman
z. Washoe County Mounted Posse
aa. Douglas County Mounted Posse
ab. Western Nevada Horseman's Association

3. Special Recreation Management Areas
A. To meet the needs of local residents and help support OHV tourism the urban interface should be managed as Special Management Areas:
ac. Necessary to provide sustainable recreation opportunities.
Vi. For local residents.
Vii. For growing OHV Tourism.
Ad. Being out our back door is the unique opportunity these areas provide that cannot be found elsewhere.
Viii. This attribute is driving intensive usage of these areas.
Ix. The number of user/days has reached the point it needs to be managed.
Ae. Should use Federal Recreation Trails Program Grants, Nevada Recreational Grants and Nevada Fund for OHVs Grants to fund development of the SMRAs
x. Needs to partner with Great Basin Institute to provide project management under BLM direction.
Xi. Needs to partner with local user groups to provide the manpower that qualifies as matching funds for the grants.
Af. Needs to partner with local user groups to provide manpower for the ongoing maintenance and management of the SRMAs.

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Recreation and Visitor Services

B. Designated uses needs to Include Motorized, Mountain Biking and Equestrian roads and trails. ag. Should not be seen as a single use Special Recreation Management Area. Needs to be multi use. ah. Mountain Biking, Equestrian and Hiking trails can be used to build buffer zones. ai. OHVs given through routes to take them through the buffer zones. Once beyond the buffer zone the road and trail network needs to provide a quality recreational experience to encourage OHV users to stay out of the buffer zones
C. Management plan needs to adopt existing roads and trails. Aj. All existing routes should be considered opened unless closed xii. If the average person would recognize what they are looking at is a road or trail being used by OHVs, horses or mountain bikers then it is an existing road or trail. Xiii. Areas should be managed to limit use to existing roads and trails. Ak. It is understood the existing roads and trails need to be inventoried. Some may need to be closed to mitigate: xiv. Environmental and cultural concerns. Xv. To avoid conflicts with privately owned lands. 1. Need to consider the model provided by the State of Michigan with its network of OHV trails utilizing right of way easements across private lands. 2. Need to give state of Nevada a chance to find a way to encourage private land owners to grant such easements. Xvi. Eliminate parallel routes. 3. While parallel routes should be eliminated it needs to be recognized that multiple routes from point A to point B is a trail network and not necessarily parallel routes. As long as the network does not give the appearance of an open riding area the network should be allowed. Xvii. Primary means to mitigate the problem should be to re-route the road or trail around the problem area. Xviii. The inventory needs to be done with involvement of local enthusiasts groups that includes a process of hands and feet on the ground to reach agreement.
I am a member of the Western States Racing Association, which has had recreation permits with the BLM Carson City District for over 40 years. I'm also a member of the American Motorcycle Association (AMA) and I'm involved with MRANN and District 36 by racing and putting on events. In recent years it has become increasingly harder to apply for recreation permits. The cost associated with these permits has priced volunteer organizations or clubs out of the riding district. The most important area that I want the RMP process to address is recreation application process. I would like all courses on record and trails submitted by clubs and organization to be included in an EA/Environmental Impact Statement. This would increasingly decrease hardship on clubs applying for permits
As a hunter and recreational user of our cherished Nevadan lands, I consider our public access to be essential, not only for my own liveliness but for the vitality of the entire region.
-The BLM should continue to not only allow but promote responsible motorized access and recreation. The BLM should formulate a prorecreation alternative, not draft or present only plans with significant reductions to access.
IMBA and our paid trail consulting team, Trail Solutions, are available for consultation on managing, designing and constructing sustainable trail systems. We greatly appreciate your efforts in to enhance outdoor recreation opportunities and thank you for accepting our comments. We look forward to continuing a productive relationship in the future. Please feel free to contact us, Jeremy Fancher (303) 545-9011 (jeremy.fancher@imba.com) if we can be of further assistance.

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Freedom...it is what America is all about. Men and women fight and die for this one simple word...this word that defines us, that separates us from the rest of the world. If you take away our freedoms and our rights we become what we have fought to change, we become weak, ignorant, and susceptible to the ways of the rest of the world. One of our freedoms, our rights that I hold in the highest regard is "A well regulated militia being necessary to the security of a free state, the right of the people to keep and bear arms shall not be infringed"...but another freedom we have along with this one is the freedom to go out into the desert or the hills and hunt or just shoot for recreation, to keep our skills with our firearms sharp so our ability to defend home or country does not decay and wither. I agree that some of the areas that we shoot at are a mess, but it is unacceptable to punish everyone for the wrongdoings of the few. I personally try to leave the area I shoot at cleaner that it was when I left. My Father and I police our brass and often bring a rake, shovel and a few trash bags to clean up the brass and shotgun shells that get left behind by others so that we can all enjoy the land and the right that we hold dear. I ask you as an American, as a Nevadan and as one who cherishes the second amendment with all my heart and soul...do not take away our rights, our privileges, or our ability to shoot in the land that God gave America... Doing this would be a disservice to all that have fought and died to keep you, myself and America free and safe.
To many places are already closed to outdoor recreation. These lands are supposedly owned by the American people. While I live quite a ways from many of these lands, I would like to have them open if I would ever get a chance to travel to any of them. Keeping them open for recreational use is the best option, and does keep them truly wild.
I support the Canoe Hill/Spanish Springs Canyon Trail System, for non-motorized multiuse by walkers, hikers, runners, and mountain bikers, located in Sparks, NV, near the Golden Eagle Regional Park in BLM Sections 19 & 30. There are many people in the area that would enjoy the trail system if it were to be available.
I am submitting this email in support of the inclusion of the trail system, proposed by the Canoe Hill Trail Association, into the Carson City District Resource Management Plan (RMP) and Environmental Impact Statement (EIS) and that the Canoe Hills be designated for recreational and public purposes including mountain biking.
I am a hunter, target shooter, mountain biker, and hiker in Wellington. It is critically important to me and my neighbors for BLM and other public lands to remain open for hunting and shooting. Vehicular access is also extremely important because that is the only practical method of bringing in our recreational equipment. Please keep the public lands open for all of us.
Off-Road Vehicles -- Off-Limits in HAs and HMAs Off-road vehicles should be prohibited in HAs and HMAs. ORVs are notorious for their damaging effects on range conditions, creating soil and vegetation disturbances and probably spreading weeds. They also disturb the peace and could be used to chase and harass the wild horses and burros.
I do not want to see the Sage Grouse used as a reason to restrict OHV use on BLM land, it is indicated on the list of threats as having a low impact on the Sage Grouse.
I think that it is extremely important that the BLM recognize the importance of hunting and recreational shooting on federal lands and how the revised RMP must keep the lands managed by the Carson City District office open to hunting and recreational shooting.
For all BLM land managed by the Carson Valley unit I do not feel it is necessary to have any seasonal closures. I recreate there year round and my destination is determined by the weather and conditions on the ground and I feel that mother nature does a good job of seasonal access.

Table C-15
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A little background on me. I live in the San Francisco Bay Area but I have been recreating on Nevada BLM land for more than 25 years. Pine Nuts Range, Weeks/Fort Churchill, Hungry Valley (Moonrocks), Smith Valley, Mason Valley, Middlegate, Eastgate and Wilson Canyon are some of my favorite areas. Though I live within an hour of 3 top notch OHV areas my family and I like all of the opportunity available on Nevada BLM land and recreate on it 40 to 50 days a year, year round weather permitting. Dirtbiking is our primary form of recreation on NV BLM land but we also hike and do a little target shooting. We enjoy the area so much that we have considered moving to Minden to be closer to the our favorite place to visit. I am submitting comments with the hope that the changes that are sure to occur will enhance our recreation experience and not hinder it.
For the Pine Nut Range I would like to see more camping areas off of Sunrise Pass Road. It would be nice if the BLM took over the NV State land at the end of Johnson Lane and developed that area for primitive camping. I would like to see the Pine Nut Range designated as a Special Recreation Area with OHV use as a described use. More trail signage would be helpful and inclusion of user created trails in the trail network is a must. Building more single track and ATV trails that allow travel from Carson Valley to Smith Valley would be on my want list. I do not want Burbank Canyon to be designated as Wilderness Area, it does not meet the requirements of a Wilderness Area.
Weeks/Fort Churchill area needs more signage and trails. More primitive camping areas. A program to clean up the burned out cars and other trash-possibly more law enforcement in the area.
More law enforcement presence in Moonrocks and signage of the user created trails. Designation as a Special Recreation Area with OHV use as a described use.
In Smith Valley an OHV corridor that allows legal passage of non-street legal OHV's to get from Hudson Pass Road to Red Canyon in the Pine Nuts.
There needs to be more camping area available in Mason Valley. More law enforcement in the Weed Heights area to put a stop to the trash dumping in the area. An OHV corridor to link the west and east side of the valley in the Yerington Area is needed also.
Middlegate needs signage of the trail network, including user created trails. More camping opportunity on BLM land.
Eastgate area needs to have the wilderness study area released and open to motorized travel. Construction of trails that link the Middlegate and Eastgate areas.
Recreation/OHV (Hunting, Fishing, Hiking, Biking, etc.) In rural Nevada there is a long tradition of recreation in and on our public lands. Recreation is one of the few remaining affordable, family-oriented activities. Children are exposed to our public land and its abundant diversity of resources providing a near limitless variety of activities for the body, mind and spirit. Maintaining a significantly large system of routes is essential to providing for an enjoyable, safe and continuous recreational experience.
Please keep public lands open to hunting and shooting.
Just a note in regards to public land closures. Despite doing so all over the country, you have no authority to deny public access to public lands. I am strongly against public land closures, travel management plans or restrictions of any kind !!!!!
We are in support of responsible recreational access to public land for the use of off highway vehicles (OHVs), including off-highway motorcycles, dual-sport motorcycles and all-terrain vehicles (ATVs). While no single recreation type is appropriate for every setting, there are certainly many places where OHV use can exist in harmony with other uses while preserving important natural and cultural resources.

Table C-15
Recreation and Visitor Services

The PLF prepared a position statement, "Recreational Shooting on BLM Public Lands," dated August 17, 2010. Our position is that the BLM Land Use Planning Process should identify potential shooting ranges or other areas of public land where concentrated recreational shooting activities are currently occurring and where such activities might be directed in the future. Recreational shooting on public lands should be restricted or prohibited by land management decisions only in public land areas where dangers to public safety exist or where restrictions or prohibitions on recreational shooting are needed to prevent damage to valuable resources. That position statement is attached for reference.
Expansion of communities in the Carson City District has diminished the availability of private and public lands that are used more intensively by recreational shooters. These areas do not include those devoted to formal shooting ranges. Areas of public lands that, due to their location and features, are better suited to more intensive recreational shooting are relatively rare. Those areas that are suited should be identified in the planning process and protected from other activities that could be located in other places
Government statistics show that shooting is one of the safest forms of recreation having fewer incidences of death and injury than hiking. The favorable safety record of recreational shooting could be increased by BLM taking a proactive stance toward this recognized legitimate use of public lands. This can be done by first identifying suitable areas and then entering into partnership arrangements with local governments and the private sector to provide minimal improvements designed to make for safer shooting.
The Carson Valley Trails Association (CVTA) has been working with the BLM for several years on an east Carson Valley non-motorized trail system, relatively close to the urban front area. Much of this trail system will become part of the Discovery Trail, anticipated to become a National Recreation Trail and theme trail around the entire Carson Valley showcasing the areas rich history, culture and natural resources.
We are currently in the beginning phases of an EA on this project with the BLM, approximately 45 miles of non-motorized trail open to hikers, dogs, equestrians and mountain bikes. This includes four community loop trails near urban areas for residents and visitors to use. This project will provide a non-motorized trail system opportunity and would be constructed, signed and maintained to typical non-motorized trail standards. CVTA does not advocate any closures or changes to existing motorized use across or outside of this new non-motorized trail system.
I have lived and regularly ridden in northern Nevada for over 15 years and highly value the exceptional motorcycling opportunities available here. It is the primary reason I choose to live in northern Nevada. PLEASE do not further restrict motorcycle use on BLM managed lands. ALL existing roads, trails, and single-track should remain open.
Personally I'd like to see things star the same or get better for OHV use in your area. I'd like to see a public motocross track in your area, out houses at Johnson Lane and Ruenstroth and more off road races I'd like to know where the conflict areas are to offer comment also. I'd like to know about Voluteer days.
Doug Holcumb said you were looking for comments. I've helped clean up near the dump about 10 years ago. We helped clean up at the ranch BLM owns between the prisons in Carson about 10 years ago. I've gone to BLM meetings about 12 years ago. I like helping.
In closing, I want to provide a little perspective on who it is that truly utilizes public lands for recreation. In my 15 years of avid riding in the Carson City District, I have crossed paths with less than half a dozen equestrians, only 2 hikers, and surprisingly not even one mountain biker (too much sand I guess). During hunting season I do regularly see a variety of pickups and ATVs, on most every ride in October and November. I come across other dirt bike riders about half the times I go out (about 30 times per year), and I generally try to ride where everyone else isn't. My point is that motorcycles are percentage wise by far the highest recreational user of public lands. I believe easily in excess of 75% on an annual basis. The RMP must fully recognize this fact and likewise have a focus that maintains this function and legitimate use.

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I know you hear from preservation advocacy groups (most of which are well funded lobbyists, and some of which are radicals), with a battle cry of "save the land for future generations". What they really mean, as history proves, is "close the land" to all vehicles and industries (misleading the general public that people hike to extremely remote and dry areas, which they don't, as evidenced by my data above). I submit to you that future generations will want to ride motorcycles and OHVs on public lands as my three young children and their young friends already greatly enjoy. Clearly motorcycle and OHV riders share responsibility in being good stewards of the land and I am teaching my children those values. Respectfully, it is your responsibility as public servants/project managers to maintain a land use and recreation plan that accommodates and enhances features for the highest percentage user. Perhaps this plan can recognize certain areas as exceptionally valued riding areas (Areas 2 and 3 in my opinion) and given an enhanced motorcycle/OHV designation while still recognizing the "open" designation is of utmost importance throughout all of northern Nevada.
The purpose of my comment is to stress the importance of the "Vegas to Reno" event held in August (August 17, 2012.) This event is very important to rural Nevada. Over 5,000 people, racers and pit crews, travel through rural Nevada; we go thru Las Vegas, Beatty, Goldfield, Tonopah, Mina, Hawthorne, Fallon, Dayton and Reno. We sale out these towns of gas, food, lodging, ice, and auto parts. Special Events are very important to any community and I know the people in the above mentioned communities count on the revenue from this event every year. The "Vegas to Reno" race began in 1996 and is the flagship of Best In The Desert. The race receives world wide coverage and the event is televised, again giving Nevada exposure. Nevada is the only state in the United States, that an event like this can be held and the BLM permitting this event is a real feather in their cap being able to permit an event of this magnitude. Thank you very much for allowing me to comment on the importance of "Vegas to Reno!"
The CVTA works closely with Douglas County on implementing the County's 2003 Comprehensive Trails Plan, which this proposal closely follows. CVTA also works with the USFS, The Nature Conservancy, private landowners, the Washoe Tribe, Carson City, and numerous other entities to develop and maintain quality trails systems in the Carson Valley area. CVTA has developed about 30 miles of trail elsewhere within Carson Valley, including about 10 miles of the Discovery Trail.
The proposed trail system currently goes through areas identified by the BLM as potential disposal areas. CVTA recommends a minimum of 600 feet of trail corridor per each side of the trails to be retained in BLM management if future BLM land disposals were to occur. This protects the trails while preserving a wildlife and open space corridor. The following locations are where the proposed trail system and identified potential BLM disposal areas overlap: McTarnahan Hill Quad, Southeast quarter of section 26, T.14N, R. 20E McTarnahan Hill Quad, East half of section 35, T. 14N, R. 20E McTarnahan Hill Quad, East half of section 1, T. 13N, R. 20E Gardnerville Quad, Southwest quarter of section 28, T. 13N, R. 21E Mt. Siegel Quad, Southwest quarter of section 11, T. 12N, R. 21E.
I'm writing because I'm an avid offroader, camper and hunter in NV. I enjoy getting out with friends and family in our beautiful outdoor areas we have here. I do not want to see trails shut down that my future kids and friends will never get to see because of this. We always practice the tread lightly moto and leave things better than when we came. I've also participated with groups like Reno4x4.com for trail maintmence and cleanups. Please keep in mind that most of us are responsible outdoorsman and help keep things just as beautiful and full of life as they are. Most of the offroaders in the area would be more than happy to help maintain trails where funds do not allow so. Thank you for your time,
I am concerned that the BLM will close our OHV Recreation Areas. I grew up using these areas, my family now uses these areas, and I want my children's future families to be able to use them. My livelihood (my job) depends on OHV Recreation and if these areas are closed my company will lose money. I love living in Nevada because we have so much freedom to recreate. Please keep our trails open!

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AREA 1 (outside the dotted blue line):
I ride in the area north ofFish Springs Road on a monthly basis. The Pah Rah Range once per year.

My husband and I are in our mid-fifties and we both have physical ailments that make most outdoor activities impossible. I have Reflex Sympathetic Dystrophy and my husband has arthritis in his knees and hips. Off-roading in our Jeep allows us to see areas that would otherwise be completely cut off to us. We know many people who off-road and they, like us, never leave the trail or drive over vegetation. Also, there's a saying offroaders go by, "Take out more trash than you bring in". There are hundreds of off-road clubs that maintain trails and educate people about responsible off-roading. There is a very small percentage of irresponsible and ignorant hikers, campers, and off-roaders out there. Please don't punish the majority because of a small percentage of the population.

Please keep public land trails open to the public.

5. Social/Economic Concerns: Nevada has the highest unemployment rate in the nation. Yet, when our rural communities need recreational tourism to help bolster their economies, the BLM is busy trying to shut down recreational areas for hunting, fishing, camping, etc. MULTIUSE has assisted in the survival of certain areas. The BLM should only assist in management IF REQUESTED BY COUNTRY GOVERNMENTS. No country can afford to waste its resources, whether loggin, mining or wildlife. California has lost 1000's of farm acreage due to a small fish that entered their irrigation system and the government came into shut those farms down. Where is the COMMON SENSE in federal agencies? Move the fish....

Dear sir or madame,
Please do not not restrict or ban the use of ORV's on our public lands.

"Public Lands"....hmmmm. I wonder what PUBLIC means???? Oh, that's right. It means it belongs to the PEOPLE! Excuse me, but, I believe BLM is just supposed to care for public lands and make sure they remain public. I don't ride. Haven't for years. But I believe that our lands should be left open for people to enjoy. The tree huggers are just selfish liberals who don't think of anyone but themselves. They can't conceive of enjoying the land for anything other than isolating it from everyone so they can say "Look what I"ve done."

Leave the land accessable to riders. It's their land too.

To whom it may concern, I am interested in keeping as much BLM land available as possible. I've seen 'wilderness study' areas all over our land and it seems too restricting. My family rides four wheelers and we go to the Black Rock and Smoke Creek areas at least three times per year for camping, exploring, geocaching and photo shoots. It would be a real shame to limit access to any of our wilderness areas for the public to enjoy. Thanks for listening.

My family uses the blm on a monthly basis. We use sand mountain, ohv in redding, ohv areas in most of California. We love the outdoors and respect it for what it is. You must not restrict these lands Good management of these lands is one thing but to stop their use by the public will be wrong.

Please do not shut down any more area than you already have. I am a sportsman that uses the rural areas in this state on a regular basis. I do not see any point in making more land inaccessible to the people that use it. Is it money, are BLM employees just trying to create jobs for themselves, I don't understand. Please stop.

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I am an avid ATV explorer. I have made trips in excess of 750 miles in a week in each of the past two years, from Fallon to Idaho, and from Jarbidge past the Snake River in Idaho, reaching a geographic parallel with Montana. I ride more than anyone I know. I have been ATVing for over 30 years. I do so responsibly. All of my teenage and adult children have been taught in the proper use of an ATV and how important it is to stay on trails.We recognize that there are a number of public interests at stake in the process of reviewing the use of public lands. I utilize these lands frequently, and I appreciate them for their beauty, and the means by which my family and I access these lands is principally through the thoughtful use of All Terrain Vehicles.
A plan for the use of the lands must assure that passage through the lands is maintained through the dedication of specific roads and trails for the use of ATVs, while ridng thoughtfullly and intelligently. It is a matter of balancing the opportunity through the use of ATVs to explore our western lands while at the same time preserving the beauty of the lands for the enjoyment of all.
My main concern is access to trails and OHVs.
I have been informed that the BLM, Carson City District-Sierra Front and the Stillwater Field Offices are seeking public comments to identify issues and concerns. My husband and I enjoy off roading and take trails at least once a month, usually more. We love off roading because we love and respect nature.
5. Hunting and the use of temporary blinds, during hunting season, should not be restricted beyond current State laws and regulations. Archery hunters should be afforded the opportunity to erect portable blinds for the duration of their seasons.
Hello, my name is David Lake, Plumas County Calif.. My family and I have been active throughout the entire north end of Nevada for over 40 years. We enjoy traveling the entire area. We hunt, sight see and seek out pioneer history in the north state. We have noticed quite a few changes in regards to limiting our travel. We do not approve of the closures and find very little reason for them. We see more damage by the force of nature than that of travel by man. Please keep our land open to us. Thank you.
I am writing this to whom it may concern this as i am out of town on business for the the public meetings concerning any area that might be closed to off-road use.this was brought to my attention from an email sent to me by ktm of reno, a local motercyle retailer.I am against any type of closure to any off road use.It blows my mind how goverment can take my tax dollars and do what u THE GOVERMENT WANTS ANYTIME ANYWHERE AT YOUR WILL.enough of making public lands into so called wilderness or limit there use to a selected few.
I support the Spanish Springs Canyon/Canoe Hill Trail. Please allow the Canoe Hill Trail Association as well as other Volunteers, Stakeholders, and Trail Supporters to maintain this busy and flourishing multi-use trail network. This trail provides much needed outdoor recreation for many groups of enthusiasts in an area of Reno-Sparks-Spanish Springs with very limited outdoor recreational opportunities. Most importantly this trail provides a safe place for the youth of Reno- Sparks-Spanish Springs to enjoy, learn, and recreate outdoors in our wonderful State of Nevada.
We all have seen the numbers drop by a large percent in the last four years hurting the economy of Fallon and the revenue raised at the gates to take care of the public lands we all love.
the Four Stroke Series helps fix all of these by showing people a safe way to race, plus bring people back to sand mt. With the Four Stroke Series and there track record in other locations it should be obvious the upside it would have for the area. BLM should be asking them to have a race instead of making them jump through hoops every year just to be shot down. I hope the BLM will see what I see and what the other parks have seen to they make the correct decision.

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These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.
Recreational vehicle activity should be minimized, as its damaging effect on range conditions has been widely documented and the animals have been harassed or killed.
I am 50 and live in So. Tahoe. Me my family and friends have ridden from topaz to the Black Rock for the last 15 years, mostly riding from the dump in Gardnerville or Johnson Lane. We ride dirtbikes and dry camp and I have done about 10 races in our area including VA grand prix. I have about 500 days riding in your area.
With respect to land withdrawals, I believe it is wrong to incorrectly label lands as primitive or wilderness that are not truly so; likewise, to not label regions that are in pristine condition would also not be right.I believe it is possible to come up with reasonable solutions that occomodate 90% of the needs of each group. when considering what lands to leave open, and which to close: 1) Maintain multiple routes of entry and egress from the various areas for ATVs. 2) Assure that the trails connect. Segmentation, or losing the ability to travel from one area to another on one quad should always be avoided. 3) A lot of commerce and trade happens through the use of ATV travel. I would say how much I spend in ATVing each year, but my wife would not be happy to see the amount. 4) ATV time with the family allows teenagers to have some fun with their parents in the great outdoors. As we age, the ATVs take the place of the hiking that I used to do so extensively. My knees just aren't what they used to be, and an ATV provides me access to the outdoors. 5)Develop community forums or associations to help us self-police our activities. I am not against helping to build trail signage to help keep people on the trials.We help clean our trails. 6)Encourage people to thoroughly clean their ATVs to prevent the spread of noxious weeds.
Make Wilson Canyon a designated O.H.V special use area.
Areas of concern are MoonRocks, Walker River, Virginia City, Pine nuts, and Dead Camel. With the shrinking land areas to use Public Land is causing overcrowding and overuseage. We need to keep the maximum area available for public use of our lands.
I would just like to express my concern for access to trails, communications, and topics of concern that may effect my recreation. I would also like to know about other recreations groups, invironmental impacts my recreation may effect so I can accommodate the needs of other recreation, or groups. I wish to keep my pivaledge to enjoy OHV activities with balance, in mind.
I enjoy single track trails primarily ranging from easy to expert terrain. I ride designated trails but at times find it difficult to determine wither I am encroatching on other groups activity areas. I enjoy the entire Pine nut Range.

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feel that it is unnecessary to even think about closing public land. No harm is done by riding or just playing in the dessert. Things should just stay the way they are.
2. Preserve motorized access/use on BLM lands. I ask for these reasons: a) The average age of our population is increasing and at some point in time the only practical access/use is by motorized vehicle (ATV & 4WD & 2WD). B) Due to physical or medical issues, motorized vehicle access/use is the only practical/viable way to visit/explore lands. C) Conversely, youngsters cant hike miles and miles to explore/visit some places. D) Motorized access/use is also a matter of personal and public safety.
My anecdotal tales: While mountain biking on two separate occasions, co-riders broke (a) leg in two places and (b)ankle. In (a), Care flight could not land after arriving on scene (too many trees on steep slope) the first aid to arrive was by private ATV riders! Followed by 4WD trucks and eventually an ambulance. In (b) I was able to ride back to our parking spot and return via 4WD truck.
3. Law enforcement. It upsets me that BLM does not tackle known problem areas-either alone or in conjunction with the appropriate sheriffs office-regarding illegal dumping and shooters leaving behind their shot-up targets and trash (yes, I realize BML- I we so did tackle once such area recently). Example area: Reno, Double-Diamond vicinity, there is a popular shooting area north of Savehill gun club to the east of the electrical substation. On any given weekend one will find dozens of shooters leaving behind trash. Currently there are many (sentence cut-off at the bottom; refer to comment letter).
I believe in conservation to the point that it is necessary, off road enthusiast really do not cause a resource concern. The rules that are already in effect keep people on developed trails, in my experience. This is withheld but there are always going to be people who break the rules.
3. Access restrictions should be carefully thought out with a priority in protecting the lands, vegetation and wildlife. All public lands should be accessible to the public with vehicular access limited to existing roads and trails. No existing roads or trails should be closed without careful consideration of an access plan for the respective area/range. A road on every ridge and in every drainage is damaging in a lot of ways, but prohibiting vehicular access to an entire range is preventing access by the public and should not be allowed. Public multiple-use should be encouraged, not discouraged.
I want you to designate Wilson Canyon and surrounding areas as an off-highway vehicle park.
Recreation/OHV: Concern is having designated areas/trails that are for single track use only. Noticed in the Pinenut area single track is becoming double track due to ATV use. Would like to see single track marked as single track use only
I encourage the BLM to grant permits to allow off-highway vehicle organized events in the Pine Nut Range. In the past there have there have been motorcycle "endurd" trail rides, one at the east end of Johnson Lane, and another based out of Dayton Fairgrounds. These "Wild Horse" and "Wild Pony" endurd trail rides are a great way to recreate responsibly on BLM designated roads and trails, and provide a legitimate use of this public land. An economic benefit is also derived by local businesses. Please allow these events to continue.
I think hunting of sage grouse should be banned until they are nit longer close to being listed on the endangered species list.
I ride my off road motorcycle on many trails through out the Pine Nut Range, east of Carson City, also between Carson City and Virginia City. These roads and trails have been there over 100 years, many of them. Thus, there is historical use of these roads and trails that conforms to our cultural heritage. Keep these dirt roads open to honor this historical use, and allow people to explore historical sites all over this Pine Nit Range, on all existing dirt roads and trails.

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We would like the revised RMP to specifically address the importance of hunting and recreational shooting as traditional and historic uses of Federal public lands and explain how the plan will keep the lands managed by the Carson City District Office open to these activities. Although Federal public lands are generally "open unless closed" and vast areas remain open to hunting and shooting, we are seeing an alarming trend in public lands being closed, especially to recreational shooting.
The ability to access public lands has also become a significant factor. Even though much of the public land that BLM manages is open to hunting,the ability to access huntable areas has a tremendous impact on hunters who rely on public lands for their hunting opportunities. Many land management plans are designating which roads and trails will remain open or be closed to off highway vehicle (OHV) use. Many hunters depend upon OHVs to get to huntable lands and to retrieve legally taken large game animals. If the District will be including vehicular access as part of the RMP, we request that the impact of any road closures on hunting, as well as recreational shooting, be addressed in the RMP.
.As population centers along the borders of public lands continue to expand and more people are turning to public lands for recreation, lack of direct management in terms of identifying areas as suitable for recreational shooting has created safety concerns and conflicts with other recreationists in other areas. The end result in nearly every case is that long-established recreational shooting sites are being closed causing shooters to travel further afield from home and roads in order to enjoy their public lands. It also has the effect of moving displaced shooters into areas that may be" at the maximum level of-sustaining safe shooting. Identifying popular and suitable recreational shooting sites in the RMP will provide a much needed anchor for this activity and will ensure that management decisions such as trail development does not conflict with established public use.
Addressing hunting and recreational shooting in the RMP will also comply with the recommendation in the Recreational Hunting and Wildlife Conservation Plan which was released in December 2008. The Plan was prepared under the direction of Executive Order 13443: Facilitation of Hunting Heritage and Wildlife Conservation. Recommendation 21states that hunting and recreational shooting should be incorporated into Federal agency planning processes and that management plans should designate shooting areas. Under the chapter titled "Expanding Access to Public and Private Lands" it states: Hunting and recreational shooting with firearms and archery equipment are important elements of America's outdoor heritage, and are uniquely dependent upon public access to federal, state, and private lands. Constraints on access have been identified as one of the leading impediments to sustaining and growing participation in these activities. Unless recreational shooting is managed in a manner commensurate with other recreational activities, the continued closure of shooting areas will inevitably become management's response. Eventually the cumulative effect will be the widespread loss of access, if not opportunity, for recreational shooters, as well as hunters who depend on public lands to practice and sight-in their hunting firearms. The NRA strongly recommends that the RMP work within the intent and spirit of the Executive Order by taking the steps necessary to ensure that the citizens of the greater Carson City area have access to Federal public lands for hunting and recreational shooting.
My family and I have enjoyed Pah Rah Canyon and Canoe Hill for many years. We have carried out much litter. I wrote to you several years ago and was told the area would be protected from development. I am thankful to see that this has been the case. I am also very pleased to note that you are considering maintaining the trail. It may not be apparent from public comment, but it is clear that many walkers and mountain bikers enjoy the area and use it responsibly
Also, OHV enthusiasts don't cause any more range degradation than the "Feral horses". I have seen many occasions of the destruction of this invasive species

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My name is Curtis Johnson and I am the President of the Poedunks. The mission of the Poedunks is listed below. I am submitting this email on behalf of the Poedunks in support of the inclusion of the trail system, proposed by the Canoe Hill Trail Association, into the Carson City District Resource Management Plan (RMP) and Environmental Impact Statement (EIS) and that the Canoe Hills be designated for recreational and public purposes including mountain biking.
Please keep public lands open to the public. This includes the use of off highway motor vehicles. As tax payers we should have the right to use the land that is public.
We need to designate areas for rifle or shotgun ranges. I have to travel more than 30 miles to use a range. We can not shut off access to our public lands. It sickens me to see how the public treats our surrounding public lands. In my opinion these lands need to be patrolled and cleaned.
Please consider keeping the open land available to access for recreational activity. More and more land is being taken away for recreation. This is important for families that enjoy the outdoors. I have been utilizing the recreational areas set aside for many years for hunting and fishing along with dirt bike riding. I firmly believe that keeping the land available for access keeps families together and kids off drugs.
As an avid outdoorsman, one of the primary reasons my family moved to Nevada is the largely unfettered access to huge open areas of land (BLM) available for multiple public use. As a family, our primary interests are: - Hiking - Horseback riding - Shooting - Hunting - ATV/Dirtbike riding
As the Carson City District re-evaluates it management plan, please consider the views and interests of this Carson District resident. Please preserve the open access to BLM lands for hunting and shooting.
My concern is that the BLM is losing sight of the fact that public land is owned by the public, therefore the BLM should be making an effort to improve and encourage land access by the public rather than making access more restrictive. Public uses such as camping, hiking, hunting, fishing, ORV riding, shooting, sightseeing, and so forth must be ENCOURAGED rather than DISCOURAGED. Making more areas either off limits or making legal entry so complex that the majority of people are not able to access lands legally is wrongheaded and is NOT the duty of the BLM. Any new rules or laws that restrict land use by the private individual are not in the interest of either the public nor in the interest of longevity for the BLM.
In my opinion, the BLM should not be making more new laws that only discourage use of public land by the public. Rather they should spend their allocated time and money enforcing common sense laws to preserve the land for use by private individuals. Arresting and pressing actions against people that dump their garbage and do other such irresponsible things to OUR land should be the BLM's primary focus. I am NOT for more restricitons!
I want to address the need for maintained trails near the Canoe Hill region. Many of my friends and family use the exisiting trails on a weekly basis for running, hiking, and cycling. Our region is unique in outside activities and we should do invest in our environment.

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I'm concerned with the loss of more open Public Land our historic events such as Virginia City GP, Vegas to Reno, and other notable events can be held for future generations to enjoy. My Family has been recreating in open ohv areas for my entire life and I want to take my daughter to the mountains and desert to enjoy ohv riding, fishing, biking, and hiking.
Many people use the moonrocks area for family recreation (primarily 2 and 4 wheel OHV activities and camping.12 months of the year, people come and use all of the various roads and trails. Many stay on the main roads, but most use the ohv double and single track. Restrooms are needed.Icome lo Moonrocks 2-3 times per month. I purchase food. fuel, parts In the Reno/Sparks area when visit. Any action which reduces OHV access and use at Moonrocks will effect the economy of surrounding communities. I would like to see a common sense management policy which provides maximum access and continued use of Moonrocks by OHV enthusiasts, as well as other outdoor recreationalists.
Fire Management: Again in the Pinenut area noticed trail closure due to erosion. What I've noticed is riders riding around closed trail closures and continuing on the closed trail. I think if the trail was left open new trails or riding around closures would be less damaging and keep riders on established trails.
Declare HMAs closed and off-limits to geothermal/fluid mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration and mining. Recreational vehicle activity should be minimized, as its damaging effect on range conditions has been widely documented
I am submitting this form to support the inclusion of the trail system, proposed by the Canoe Hill Trail Association, into the RMP and that the Canoe Hill Trails be designated for recreational and public purposes.
It is my desire to see public land remain open to the public. I would like to see off road vehicles including dirtbikes, buggies, trucks, and other off road vehicles continue to have access to the current off-road trails. I'd like to see the government work together with off-road clubs to ensure a racing community can continue to race. I also hope that the historical Vegas to Reno Race can continue to prosper.
It is my desire to see public land remain open to the public. I would like to see off road vehicles including dirtbikes, buggies, trucks, and other off road vehicles continue to have access to the current off-road trails. I'd like to see the government work together with off-road clubs to ensure a racing community can continue to race. I also hope that the historical Vegas to Reno Race can continue to prosper.
1. I enjoy the free access to enjoy family riding. From a individual that moved from Las Vegas and understand the confusion of closing access will have in the freedom to ride
2. My family is very concerned with the environment and I teach my children to take care of our riding areas. 3. All my children slow when near livestock and often stop to enjoy the beauty. 4. I teach my children to ride only on trails only. I spend many hours in the desert and rarely see other people then riders.
5. I spend 3-4 days a week at Moonrocks with my son and daughters. To take that family time away would be horrible to my family. We travel 3-4 times a year to San Mountain. We as a family live and love to ride!
4. I am a recreational shooter and believe that shooting should not be prohibited on public lands. Restrictions and regulations may be necessary in "heavily used areas", but no prohibited. Shooters have as much right to use and area as a bicyclist or hiker. Regulations can be imposed to provide safety and use by both users. Public gun ranges are not the answer either, due to their congested environment, tight regulations and regulated use. Shooting on public lands is a rare gift that Nevadan's have been able to enjoy since settlers arrived. I strongly oppose widespread restrictions on shooting.

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As a Nevadan resident and parent of two children I rely on our open space lands to keep my children busy and out of trouble. We as a family use the lands almost every weekend for motorcycle riding, bicycle riding and camping. We as a family are also members of the MRANN racing association and have open desert races all through the fall and spring. The MRANN group has found it increasingly more difficult and expensive to acquire permits for our FAMILY racing events. We leave our racing areas cleaner than we find them, we also have yearly clean up events where we clean up garbage from other BLM lands. I have a hard time trying to understand why the BLM and federal government wants to close more and more of our public lands, one of the reasons I settled in the northern Nevada area is for the abundance of public lands to explore as a family event. I would have to say I am against the closing of any public lands to motorized vehicle traffic and see no reason why these lands cannot be shared by everyone.
J, Comments Regarding Requirements for Disclosure and Analysis Without going into unnecessary detail, BRC is very concerned about the approach some land management agencies are taking when analyzing and disclosing effects to the human environment of OHV use. An approach we encounter far too often is one that is plagued by a preoccupation with documenting what impacts vehicle use can have or may have to various resources, at various points in time, while ignoring the relevant environmental analysis. Environmental impact analysis documents often include statement after statement regarding various negative impacts of roads and vehicle use; i.e., trampled vegetation, compressed soils, increased sediment loading, disturbed wildlife etc. while including little or no information about what the existing condition is, or how the existing motorized and non-motorized uses are actually impacting resources, or whether that impact is significant, let alone a meaningful contrast between the current condition and the various alternatives. Impacts should be evaluated and disclosed in a fair and unbiased manner, with a relative sense of magnitude. Analysis of vehicle use should be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the Preliminary Proposals can be determined. Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and, ultimately, the decision reached by the Deciding Officer.
Hello my name is Victor Yohey and I would like Public Access to Public Lands! As an avid hunter, motorcyclist, and just all around outdoorsman who respects that land please don't take away Public Access. If you take away this access to public lands many families will loss the ability to spend clean wholesome fun and time with each other. In todays world many children resort to other activities that lead to a live time of crime. If people do not respect the use of Public Lands then enforce them not those that do. Put the information out there as to who one can call if they see abuse of public lands. Enforce with more Ranger Patrols. I think I have seen 2 in 25 years.

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BRC believes that resource development is compatible with semi-primitive recreational values and opportunities. We have seen cases where the oil and gas industry operates with little or no impacts on other resource values. There is a relatively high tolerance for oil and gas activities among those who enjoy OHV recreation. We do not support a no-lease or no-surface-occupancy stipulation for areas allocated to semi-primitive recreation.

The BLM has a Congressionally-mandated multiple-use mission, which must be upheld and not compromised by the single-use land management objectives promoted by certain interest groups. A comprehensive analysis of the socioeconomic benefits of energy and mineral development activities in the area should be included in the analysis.

When developing energy and mineral resources, impacts to recreational uses must be evaluated. Where recreation is negatively affected, the agency should mitigate the loss of recreational uses. Mitigation may mean a variety of actions, including developing new recreational opportunity in other areas. At least one alternative should include an aggressive recreational mitigation directive for energy and mineral development.

BRC believes that resource development is compatible with semi-primitive recreational values and opportunities. We have seen cases where the oil and gas industry operates with little or no impacts on other resource values. There is a relatively high tolerance for oil and gas activities among those who enjoy OHV recreation. We do not support a no-lease or no-surface-occupancy stipulation for areas allocated to semi-primitive recreation.

The BLM has a Congressionally-mandated multiple-use mission, which must be upheld and not compromised by the single-use land management objectives promoted by certain interest groups. A comprehensive analysis of the socioeconomic benefits of energy and mineral development activities in the area should be included in the analysis.

When developing energy and mineral resources, impacts to recreational uses must be evaluated. Where recreation is negatively affected, the agency should mitigate the loss of recreational uses. Mitigation may mean a variety of actions, including developing new recreational opportunity in other areas. At least one alternative should include an aggressive recreational mitigation directive for energy and mineral development.

F. Alternative development: A "pro-recreation" alternative is needed As noted in section B above, the agency must formulate a range of reasonable action alternatives. Given the extensively documented increase in motorized and non-motorized recreation, as well as the importance of public lands in providing recreational opportunity across the West, an alternative is needed that seeks to maximize recreation.

A "pro-recreation" alternative enhances the full range of recreational opportunities for all modalities. A "pro-recreation" alternative is not one that simply maximizes motorized uses, or maximizes nonmotorized uses. A "pro-recreation" alternative does not diminish the availability of energy and mineral development, hunting, livestock grazing or any other use. Conversely, a "pro-recreation" alternative does not mandate the enhance the availability of energy and mineral development, hunting, livestock grazing or any other use.

Table C-15
Recreation and Visitor Services

4. Comments regarding vehicle dependent dispersed camping Any TMP is also a vehicle camping plan. Therefore, vehicle dependent dispersed camping must be considered in the TMP decision making process.

Although we lack specific knowledge of much of the CCDO, we feel safe making the intuitive observation that vehicle-based camping is one of the most popular activity occurring in many areas. Suffice it to say, people seem to feel very strongly about the activity. BRC describes it as a convention, a birthright, a custom, a habit, a heritage, an inheritance, a practice and a ritual all wrapped into one. It is also an activity that is difficult, but not impossible to manage.

In other BLM District and Field offices, planning staff have sometime assumed it will be able to completely change all vehicle based camping by simply signing a new RMP and TMP. Like turning on or off a light switch. Such an assumption is neither workable nor reasonable. BRC often says; "camping ethics must evolve -- they cannot be changed simply with a signature on a land use plan."

We believe an appropriate desired future condition for vehicle based camping is; "allowed where it has been determined to a) not cause considerable adverse effects; and b) managed in a way as to minimize impacts to natural resources." In order to reach this or a similar future condition, the obvious question then becomes how to transition to this future condition from the status quo, which in many areas would be the virtual absence of any attempt at management.

We'll say again that site-specific, on-the-ground management prescriptions must be supported by correspondingly-detailed data and analysis. See 40 CFR § 1502.24. The DEIS should adequately fulfill NEPA requirements regarding accurate and adequate description of the decisions being made as well as the impacts across the various alternatives. It must be possible for the public and the decision makers to reasonably determine what affects each alternative will have on camping.

5. Comment regarding recreational user conflict
It seems that barely a week goes by before some BRC member forwards us an "action alert" from various Wilderness advocacy groups encouraging their members and supporters to send comments to land managers regarding OHV management on federally managed lands. We certainly defend their right to do this, however, we have noted that they have increasingly encouraged their supporters to refer to Executive Orders (EO) and often give detailed instruction on how to and what to say regarding the user conflict issue.

This appears to be a growing trend with these organizations, so we can imagine the planning team may have already received comments referring to perceived conflicts between motorized and nonmotorized visitors. We would like to take this opportunity to go over several points regarding this management issue.

A synthesis of the literature on user conflicts on multiple-use trails, sponsored by the Federal Highway Administration in 1995, tells us that user conflict is not due to any "inherent incompatibility" between different trail activities. It is a perceived "goal interference" on the part of the offended trail user. For example, a hiker who dislikes motorcycles is in no physical danger, but his expectation of a quiet time in the forest is thwarted when he meets a motorcycle rider on the trail. Thus, according to the research, the key element for the elimination of genuine, heartfelt conflict for any given individual is to make sure that every person who uses the trail system knows what to expect, and that the resulting experience is consistent with that expectation (Moore, 1995).

Given the long history of motorized vehicle use in the planning area, visitors who do not use OHVs are used to seeing them. In addition, a large percentage of the CCDO visitors know where to find nonmotorized experiences. Recreation User Conflict is expected to be minimal.

Table C-15
Recreation and Visitor Services

Suggestions:
Alternatives should include:
• Educating the non-motorized visitors about when and where they may encounter vehicle traffic as well as informing them of areas where they may avoid such encounters.
• Educating the vehicle assisted visitor of where the road or trail might be shared with nonmotorized visitors and encouraging slower speeds and a more courteous ethic in these areas.
• Re-routing either use so as to avoid sections of roads or trails that are extremely popular with both groups. For example, a hiking trail can be constructed to avoid a section of popular OHV route. Or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc.
• Dispersing all forms of recreational use so as to minimize conflict and create a more desirable experience.

G. Comments regarding "Issue Questions" in CCDO's RMP Planning Scoping Handouts (Fact Sheets)
In order to inject a bit of land use humor, we'll call this section the "thanks for asking" section.

In all seriousness, and despite our quibble in section E 1, we do appreciate the information and questions in these "fact sheet" (scoping handout) documents.

1. Comment on document 3.1 "Recreation and Travel Management"
• Do you prefer non-motorized travel (hiking or equestrian trails?
• Do you know of areas that you would like to see designated as open, limited or closed?
• Do you see the need for more routes of travel for motorized or non-motorized use?

Do I prefer non-motorized travel????

Not; "what kind of trail based recreational activities do you enjoy and where do you enjoy them?"
How does such a question assist the BLM in determining the recreational preferences and desires of visitors to the CCDO? It cannot. It seems obvious that this set of questions is designed to weigh the planning effort toward establishing a "purpose and need" statement to provide more non-motorized opportunities. The question (do you prefer non-motorized travel) raises significant concerns regarding whether or not the planning team holds a bias against motorized users.

Numerous provisions of law and regulation specifically preclude the agency from deliberately narrowing the purpose and need statement to bias the decision or narrow the range of alternatives.

Table C-15
Recreation and Visitor Services

I. One Alternative should include analysis required for special recreation and other permitted events
Forward-looking land managers are recognizing the many advantages of including permitted events in project-level planning projects. Specifically, land managers can reduce staff time required to process permits if the activity is considered within the analysis required for a travel management plan and/or land use plan. Impacts associated with most events are well known and extremely similar to most public use. Supplementing the analysis would not be difficult, and it would provide a public benefit to all recreational trail users, both motorized and non-motorized, to approve routes for permitted events in the programmatic and travel planning process.

Additional discussion
In anticipation of BLM's Special Recreation Permit requirements for large or organized group activities, (ATV, jeep, mountain bike, hiking and equestrian club rides often "trip" SRP rules requiring a permit) as well as to streamline the permitting process for mountain bike and OHV events, at least one Alternative should evaluate certain routes and areas for competitive and permitted events.

The BLM has permitted many off highway motorcycle races and other events in the Planning Area.
Impacts associated with the events are well know, and previous resource inventory and study (cultural and other resource) pursuant to the event permit should be incorporated into the analysis.

This Alternative would:
· Develops a process to expedite the approval of competitive and other permitted events. This can be accomplished through known "pre-approved" routes in which an event organizer can choose from. Areas and routes may have seasonal restrictions. Areas would be clearly defined and updated on a regular basis.
· Identify areas that can be used for event staging and mass starts. Areas that provide ease of access to the general public need to be utilized to promote the safety and success of the event.
· Develop a general list of stipulations that would address a full range of currently occurring permitted events (or events that will require a permit in the future).

5. Comments regarding "managing renewable energy development for geothermal, solar and wind" and "managing minerals" (all energy development)"
Potential impacts to road, trails and areas used for recreation of renewable energy development should be disclosed in the analysis. All Alternatives should include direction to mitigate for any potential loss of recreational opportunity from future renewable energy development.

The analysis must determine logical significance criteria for socio-economic and recreational opportunity impacts. Indicators such as miles of routes available for motorized use are useful, but others are needed for adequate analysis, such as number of loops, diversity of modality, number of existing campsites closed, level of difficulty, etc.

The analysis should accurately describe existing recreation opportunities available on adjacent lands. Recreational users, like wildlife, often cross jurisdictional boundaries when pursuing their preferred activities. Information should also be provided on any ongoing land management planning on adjacent lands. Such information is necessary to compare and contrast the impacts of each alternative as well how the alternatives differ from the current condition.

Table C-15
Recreation and Visitor Services

An assumption that was often proffered by other stakeholders is that closing roads and trails to motorized uses would dramatically improve the effectiveness of wildlife habitat. In our opinion, much of the rationale expressed for restricting motorized vehicle use is tied to incomplete research and grossly excessive extrapolation of research data, and is often directly contradicted by the current condition on the ground today.

The agencies must not automatically assume that closing roads and trails to motorized use will instantly increase habitat effectiveness. The analysis must not improperly assume or over-estimate the beneficial affects to wildlife resulting from motorized route closures.

Research done at the Starkey Experimental Forest and Range is the most recent and most detailed and complex research done on deer and elk in relation to human travel modes consisting of ATV/trail bike, bicycle, hiking, and horseback. Previous studies dating back to the 1970s indicate that these animals flee from all of these travel modes. Starkey research quantifies the different rates, times, and distances. However, they admit that the resultant impact on individuals has not been determined and no scientific conclusions are reached in the studies on how this disturbance affects individual health or survivability.

Likewise, no relationship has been made between the four disturbance modes and herd health. All that is known is that deer and elk run from humans using any form of travel. Nothing in the Starkey research proves the existence of motorized trails actually results in a decrease in habitat effectiveness or in an individual animal's poor health and survivability, nor is this evidence that current vehicle use is negatively impacting herd health factors.

It should not be assumed that the elimination of motorized use would drastically reduce disturbance of wildlife or improve "wildlife vulnerability" when walking persons, persons on horses, mountain bike use, bird watching, hunting and numerous other uses that are documented to disturb, harass or kill wildlife are still allowed.

Impacts to wildlife must be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle use must be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the Preliminary Proposals can be determined.

Table C-15
Recreation and Visitor Services

K. Data Quality Act
BLM's preliminary issues are deficient in excluding consideration of the Data Quality Act, Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, and related Department of Interior Information Quality Guidelines and BLM Information Quality Guidelines.

The DOI guidelines provide at II.5 that during public comment procedures, requests for correction will be considered and provide at III.4 that a request for correction not made during the draft stage may be considered "to have no merit" if the bureau or office determines that the requester had the opportunity to comment. BLM's Preliminary Planning Issues fail to advise the public of its opportunity to comment regarding data quality.

In order to comply with the Data Quality Act, draft alternatives must be based upon data of "sufficient transparency and methodology." In order for the public to comment on proposed alternatives, it must know the information bases for specific actions proposed therein. Therefore, the agency must, at the draft stage, publicly document the scientific literature or other information upon which it intends to support each alternative, if it is adopted. The public must be allowed to challenge insufficient data before a final alternative is selected.

BRC intends to challenge alternatives, or elements thereof, that are based on junk science or anecdotes. The agency must document a nexus between any alleged "need to protect" and any resulting decision to restrict motorized travel

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The BLM must consider minimal reductions if any to OHV opportunities within the Carson City Field Office's District. The OHV opportunities with the CCFO's District provides priceless opportunities for family recreation that cannot be found anywhere else in the world, OHV in NV and eastern CA is unique to these area's and cannot be found anywhere else.

Furthermore, the OHV opportunities within the CCFO's District support numerous businesses in the area including but not limited to: Motorcycle/ATV shops, 4 Wheel Drive shops, RV supply shops, Hotels, gasoline sales, food sales and subseqently these purchases support thousands of jobs.

This last weekend the Virginia City Grand Prix took place primarily on BLM lands, this single weekend of OHV racing brings over $1,000,000 into the local economy.

My Wife and I reside in CA however in 2010 we purchased a vacation home in Dayton, NV solely due to the OHV opportunities in the area. Since purchasing our home we have created over $100,000 dollars of taxable revenue for Lyon County, furthermore numerous families visit our vacation home in Dayton on a regular basis and subsequently create thousands of dollars of tax revenue for both Lyon and Douglas County via food, gas and general supply purchases.

Table C-15
Recreation and Visitor Services

There is an additional and important concern about the way in which the agencies have described this project. Our concerns is that, because the public was not adequately informed of the scope of this project, and that non-motorized trail based activities will be limited to designated routes, the agency will be reluctant to consider available options for providing non-motorized recreational routes, such as constructing new non-motorized trails when there is a need to address resource impacts and/or recreational user conflict.

From the motorized visitor's perspective, this course of action easily results in a scenario where the existing inventory of motorized recreational opportunity is used as the "inventory" to develop the nonmotorized portion of the comprehensive system. This scenario represents an unacceptable 'systemic bias' against motorized visitors.

If the agency is going to attempt to do the comprehensive plan, then it must ensure the effort has been properly scoped. The agencies should also inform the public of available options, including providing newly constructed mountain bike, non-motorized trails and even motorized trails in order to provide a sufficient trail opportunity for all visitors.

National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, U.S. Department of Interior Bureau of Land Management, January 21, 2001, p. 1- 2. [BLM's OHV] Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an "acceptable use of public land wherever it is compatible with established resource management objectives."

-The BLM should continue to not only allow but promote responsible motorized access and recreation. The BLM should formulate a prorecreation alternative, not draft or present only plans with significant reductions to access.

-Permitted and Competitive events should be included in the RMP. Competitive and social events for mountain bikes, motorcycles, 4WDs, etc., are a valid use and the permit process should be streamlined and reasonable for both motorized and non-motorized users. These events bring monies to local economies.

-Where appropriate, the planning process should address the need for "Open" designations. Dry lake beds, Hungry Valley/Moon Rocks, are but a few examples.

My husband and I are raising our granddaughter. Our family often vacations by taking All Terrain Vehicle (ATV) trips to various locations. It is how our family spends time together, and allows all of us to visit remote places otherwise inaccessible to us.

We plan on visiting Nevada, and when we do, we look forward to spending much of that time riding.

Please don't take this family opportunity away from us.

My name is Tom Taflin and I write my comments because I moved here because of the amazing recreation opportunities we have around here. I have been recreating in Douglas County since 1996 while living in South Lake Tahoe. Everybody in South Lake Tahoe comes down here to enjoy the Pine Nuts. In addition to the Pine Nuts, I love to take my family and friends to Sand Mountain and the Black Rock Desert. I finally left Lake Tahoe to be closer to the Pine Nuts in 2006 and bought a home in the Johnson Lane area. I am a member of the Pine Nut Mountain Trail Association and the Toyota Landcruiser Association. OHV recreation is very important to me and my family and all my friends. OHV recreation is a very important asset to Douglas County.

Table C-15
Recreation and Visitor Services

I would like to see more special events able to be planned in the Pine Nuts. More areas for backcountry camping would be fantastic also. I understand issues with the sage grouse and our club will help in any way to help that species. When you guys need help with anything just let us know because we know you are understaffed.
I would like to see everything open unless specified closed and minimal "wilderness". I consider myself a "environmentalist" because I care about my OHV areas and I always clean up tons of trash out there and always will. Thanks for your consideration.
Semantic nuance? Some BLM staff has suggested to BRC that our arguments presented in these comments represent a "semantic nuance" and are therefore not relevant. As we understand their argument, BRC's problem is not what BLM is proposing to do, but rather how BLM is proposing to do it. BLM staff point out that BRC and its partners recognize the BLM's directives to consider values such as the appearance of naturalness, outstanding opportunities for primitive and unconfined recreation or solitude when formulating land use plans. That is true. We also recognize BLM's authority to determine desired outcomes (goals and objectives) and allowable (including restricted or prohibited) uses and actions anticipated to achieve desired outcomes. We also recognize the BLM's ability to designate lands in the Primitive Administrative setting (recreation class), where motorized and nonmotorized uses are prohibited. But the agency should not dismiss our concerns as simply a semantic argument. We note that neither Congress nor the District Court in Utah was making a semantic argument. The reason this 'nuance' is so important was quite well expressed in BLM's original Wilderness Inventory Handbook (WIH), as well as the Wilderness Act's Organic Act Directives: "Inventory and management for Wilderness character is extremely subjective and controversial." (emphasis added)
BlueRibbon Coalition members use motorized and non-motorized means, including Off-Highway Vehicles (OHV), snowmobiles, equestrian, mountain bikes, and hiking to access and enjoy recreating upon state and federally-managed lands throughout the United States, including those of the National Forest System and Bureau of Land Management (BLM).
Also, in order to keep the OHV opportunities appealing to the general public the BLM should consider minimizing route closures when a route is determined to be closed, rerouting should be an option as to avoid the problematic area such as but not limited to: sensitive riparian areas, noise sensitive areas, critical sage grousse habitat, etc . Closures tend to eliminate "loops" and create dead-end roads which can take-away from the overall OHV experience. Countless OHV clubs frequently organize volunteer work parties dedicated to trail maintenance and re-routes, the BLM should consider using such resources when the BLM is unable to provide the resources themselves.
As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage public lands on the basis of multiple-use and sustained yield, while protecting natural values... "Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands." National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, U.S. Department of Interior Bureau of Land Management, January 21, 2001, p. 2-3.

Table C-15
Recreation and Visitor Services

According to the latest report: Off-Highway Vehicle Recreation in the United States and its Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE), "an estimated 23% to 27% of Nevada residents participate in OHV recreation. The number of registered OHV enthusiasts in California counties adjacent to the planning area is much higher than the NSRE average of 18%."

At least one Alternative should seek to meet the need to provide for increase motorized recreation experience.

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3. BLM should take into account the motorized niche and historical OHV use in the planning areas, as well as the already existing and recently expanded non-motorized opportunities available throughout the region. BLM planners should take into account the motorized recreational niche of a significant percentage of the planning area contrasted with the substantial already existing and recently expanded nonmotorized opportunities when balancing the input from conservation groups who desire that motorized recreation be drastically reduced in order to provide for non motorized recreational experiences.

BLM should also take this into consideration when/if the consideration of minimizing recreation conflict is addressed in the revised RMP. BLM must recognize the abundant opportunities already present for "non-motorized" solitude. Wilderness advocacy groups often assert that there are conflicts in values anywhere and everywhere OHV access is permitted. But BLM must balance the many venues presently available for wilderness or non-motorized recreation experiences and the relatively small numbers of people who recreate in wilderness areas. The relative minority cannot be allowed to destroy the recreational opportunities of the majority, especially where they already have abundant non-motorized recreational opportunities.

The Planning Team will, no doubt, receive many letters from members of wilderness advocacy groups and "quiet" recreation advocates indicating the overwhelming need for a non-motorized recreational experience. When considering the input of people who desire an experience away from those who use vehicles for recreation, the Planning Team must consider the already abundant recreational opportunity available to those persons both within and adjacent to the planning area.

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7. Comments regarding Issue 11 as identified on the issues webpage "Recreation and Visitor Services"
("Ditto" does not apply here as planning guidance mandates a 'range of alternatives' for SRMAs and because the CCDO is completing the implementation plan for route based recreational activities simultaneously.)
A full range of alternatives should be developed for various SRMAs. Areas with a specific recreational niche can be more effectively managed and natural resources better protected with via a SRMA.

All too often BLM planning seems to be an academic exercise, with little site specific implementation resulting from many land use plans. We encourage the CCDO to consider ways to provide direction in their Final Plan that will result in the development of necessary RAMP or other site specific planning within a reasonable and achievable time frame. (So that it would be written in the plan as an objective?)

One Alternative should be developed that enhances recreational opportunity. (Please see comments in Section G)

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13. Comments regarding Issue 17 as identified on the issues webpage "Socio-Economics The analysis should include a complete and accurate disclosure of the socio-economic benefits of motorized recreation and how it differs across the alternative

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It is vital that we keep the lands managed by the carson city district open to hunting, rectional shooting and off road vehicle use.

Table C-15
Recreation and Visitor Services

I see we had some secret meetings or meetings that were very poorly advertised. To use such to change land management to your advantage is wrong and unfair. We moved to BLM adjacent land to use such for recreation which includes riding, hunting and shooting. As a disabled veteran I use a quad to get out on the land which I enjoy very much. Without a quad or side by side I am and will be unable to enjoy what I enjoy doing and what my family purchased this land and house for. It is unfair for you to take away the use of the land that I fought for in my service time, as without a means of transportation I will have no access. It is unfair for you to use meetings that are not openly published in places other than a small time paper in the back where so many forclosures and so few people read or have access to. I would suggest meetings be advertised on the radio and by mailings as so many other politicians trying to save their jobs use.
As I understand it some of those proposed restrictions deal with the use of firearms and off road vehicles. If one can't shoot a firearm how can one hunt game or will that be restricted also? While I have owned and driven 4WD pickups for some 40 years I don't consider myself an "off roader" as I always stay on established roads. However, I truly believe your restrictions and closures will eliminate those roads from the maps and you will effectively close off vast areas to access.
I am against any proposed ban to recreational shooting in your RMP. I feel there are too many restrictions being constantly proposed and enacted on public lands today.
As a Nevadan that recreates often in the Carson district, I am very concerned with the revisions proposed to this district. I feel that the changes proposed will negatively impact my families recreation as well as those of other Nevadans. Please keep in mind that public lands are just that, public. The restrictions that have occurred, although not well known yet to the public, will definitely have an impact on all that use our public lands. Whether it is recreating on what's left of our OHV trails, camping, fishing or hunting, these changes will negatively impact all of these forms of recreation.
I wish to express my passion for being outdoors in our fine state. Nevada is a great place for exploring, due to the amount of federally regulated lands. I do wish that mixed use, or multiple use, remains a core value in any type of new regulation being developed. I often hike with a firearm and sometimes target shoot. I hope that a few people do not influence changes that may impact a simple joy of mine. However, if there is a need to restrict activities, due to scientific evidence that conditions must change, I do support some actions. Thank you, and please consider "mixed use" in any future regulations.
I wanted to voice my opinion with regards to scoping stage for the management plan for lands under the jurisdiction Carson City District and encourage the BLM to continue supporting hunting and recreational shooting/
The BLM is a multiple-use agency and among many activities, hunting and recreational shooting are allowed. However, in recent years, the agency has been systematically closing large areas of public lands to recreational shooting. As a local hunter and shooter I would like that public lands remain open and accessible to these traditional and historic uses of BLM lands. Not only are they safe activities but appropriate management tools for local state biologist.
I have lived in this area of Nevada for 39 years. I have enjoyed my public land and want to continue to do so even more in the future. I also want future generations to have the same opportunity that I've enjoyed. I have hunted, fished, hiked, camped, geocached, rock-hounded, and ridden my ATV on BLM managed lands. I have also donated a great deal of my time and energy to build water developments for wildlife (guzzlers), perform stream restoration work, conduct sage grouse lek surveys and do general clean-up on BLM managed lands as a form of "pay-back." In short, I care about my public land.

Table C-15
Recreation and Visitor Services

In order to allow the current OHV opportunities to remain appealing to the public the BLM must consider keeping the majority of their district as an "open" OHV area while limiting travel to existing routes. Many OHV'ers enjoy technical single-track type trails, while others enjoy wider trails and full size roads, sand washes are also popular, the diversity of route types on BLM land is one of the reasons that many like myself visit the area. Subsequently our visits create tax revenue and help support the local economy. The Pine Nuts Mountain Range is known for it's single-track trails and sand washes.
I just read that the BLM wants to close PUBLIC land to shooting! Your "reasoning" is that it is resource harming. This is ridiculous. These lands have been PUBLIC lands and open for shooting and hunting for many, many years and I've yet to see any "resources" harmed in the 66 years that I've been alive. I sincerely hope you reconsider this plan and throw it in the trash where it belongs!
Dear Sirs, After 40 years as a dirtbike rider, I see the single at present is a mess. Make it directional loops, take the criscrose out. Post rules on roads to who has the inside track. Post miles and average time to travel loops. Add and opean up rest spots.
I am strongly opposed to this measure limiting access or prohibiting use of the public on public lands. Especially prohibiting hunting, fishing, off road use or recreational shooting.
I am concerned that areas will be closed to Dirt Bike riding and racing. This activity is extremely important to my family and I. Most of our riding occurs in the Pine Nut Mountains, however, we compete in the MRANN and Virginia City Grand Prix events which encompasses other areas managed by the BLM. We have been devastated by random closures that appear to occur with no warning. ie the Jacks Valley area managed by the USFS. Thank you for allowing us to comment on this very important issue.
I'm very interested in the canoe hills trails at Eagle Canyon Regional park being open for use and included in the RMP process. This loop system is currently a social trail being used by mountain bikers, hikers, trail runners and others. It is vital to the recreational pursuits of the people of Sparks and one of the only areas of this sort within the eastern truckee meadows.
"I am petitioning the BLM board by requesting that the existing rule be modified to allow competitive motorized FSA events at SM Nevada Recreational Area".
This email is to comment on the Carson City District Resource Management Plan. We use BLM lands often when we go hiking, jeeping, camping, hunting, fishing, and biking, and want to object to any type of restrictions or prohibitions that would interfere with our access to public lands. As outdoor recreationists and enthusiasts, how we recreate is our choice and not someone else's responsibility to tell us what we can and can't do. We pick up trash and clean up trails when using BLM lands, and respect other people's recreation choices. We expect the same. We just hope this plan is not your attempt (as the U.S. forest Service has previously done in their Travel Management Plans) to keep people off of our public lands that should be available for all of us to use.
I'm an outdoor enthusiast who enjoys a larger variety of activities. I'm strongly supportive of keeping the public land managed by the BLM open to the maximum usage possible. There are numerous special interest uses that certain groups like to promote or restrict. I think it is in the best interest of the public to limit any restrictions on land use. These group need to learn how to get along and it's not the BLM's responsibility to make special destinations on land use to appease a special interest, this is counter productive and does not support the quite majority of the population. Please make evry effort to limint any restriction you pace on land use by the public.

Table C-15
Recreation and Visitor Services

To restrict access to public lands would be going against what this country stands for; freedom and liberty. Public land access restrictions will only promote unsafe and irresponsible use of the same. I believe people will not give up their rights to use public lands, so trail closures will skyrocket illegal use of the land increasing erosion and environmental impact. Resources should be aimed at maintaining trails and general infrastructure to promote responsible use of the land instead of them being used to barricade trails and restraining people from using public lands. A place with well maintained trails will considerably increase quality of life while minimizing environmental impact. Recreation is a key part of a healthy society and it is in human nature to spend time outdoors. For these motives public land closures make absolutely no sense. Closures and restrictions appear to be more of an excuse for poor management instead of an environmental, social or economical decision.
MOUNTAIN BIKES AND EQUSTRIANS JUST DON'T MIX. THE MOUNTAIN BIKES GO TO FAST AND THE HORSE CAN'T HEAR THEM COMING AND THE BIKE RIDER DOESN'T KNOW THE HORSE IS THERE AND THE WRECK IS ON!
I also strongly oppose any restrictions on firearms, shooting sports, or hunting activities and would like existing restrictions to be reviewed and repealed when found to be unconstitutional or based on frivolous claims/data.
I note that construction of a footpath up the picturesque side canyon up the east (back) side of Canoe Hill has commenced. I do not know if this is a BLM project. Before the burnout some years ago, this canyon was a great winter gathering place for Mountain Blue Birds, so my family name for the canyon has always been Blue Bird Canyon. If completed, the path will intersect the unobtrusive mountain bike trail that crosses the cliffs at the head of the canyon, giving access to the top of Canoe Hill, as well as to Spanish Springs, via the mountain bike trail..
My husband and I are recreational shooters and we use the desert, we are not the slobs leaving a mess out there. The same ones who dump their trash out there are probably the same ones who use the trash for fire practice or just use it for fun. We police out shells and take everything with us, we take water out with us in case of fire and when the conditions look like it will be too dry, we simply do not go out. We take safety seriously and we take the care of Nevada seriously and to penalized us for others carelessness is beyond unfair.
I respectfully request that recreation, in particular motorcycle riding and motorcycle racing, are included as a significant part of the proposed RMP. My husband, children, and myself currently ride in several different OHV areas within the Carson District. These areas include Moonrocks, Hungry Valley, the Yerington area, and the Pinenuts. Each area offers unique riding opportunities that are valuable to me as a motorcycle enthusiast. I also believe that having several area to ride in helps spread out the OHV users among the various areas keeping any particular area from overuse.
At each of these areas the most important element to us is access to single track trails. Most of our loops average approximately 50 to 75 miles. Being able to link the various single track trails to each other is very important so that we are not just riding around on roads. It is also important for us to have access to pit areas in the OHV areas where we can safely park and access trails.
Allowing a streamline process for permitting motorcycle races should also be included in the RMP. Each of the above mentioned areas have had motorcycle races approved in the past. I would respectfully request that the motorcycle races are allowed to continue in the future. As a racer, I am more than willing to work with BLM to modify and/or compromise on various race courses if it is found that we are running through a sensitive area. Please include as much and as many of the approved race courses as possible into the proposed RMP. Also, please include ways to modify and expand race courses so that we are able to rest certain trails and areas while still being able to put on quality events each year.
More than anything I am really hoping that the RMP will ensure that my children will have places to take their children to ride. Public lands are valuable and need to be managed in a way that everyone can enjoy it. Compromise and management will take us all much further than closure ever will.

Table C-15
Recreation and Visitor Services

I disagree to any closer of any blm land to hunting or shooting sports
In the update of the resource plan, please keep in mind and place as an important element, the interests of full access to hunting and recreational shooting. My wife, family members, and myself fully support hunting and recreational shooting on all public lands. This is a very important resource to us. This right has been in place since the lands become public domain; please keep it this way.
I protest planning to modify BLM RMP to prevent access to federal land. Creating a matrix of restricted use essiantliy does this. I also complain about the hush-hush method that the planning process has taken. I also complain that BLM maps are not on the planning web-page as the planning page states they are.
I think it is a crime to try and sneak any legislation without representation from ALL residence of this state. The hunting in our state has done very well over the past 50 years. Please keep your nose out of our hunting and fishing in Nevada. LEAVE US ALONE.
Please do not allow mountain bikes on the section of snow peak it is not safe for horses in that section to share the trail with bikes. They have another way to go thur so please don't allow this to happen. Patricia Mehserle of Washoe Valley
I would like to know why is that Blm is always wanting to take away more and more land from the American sportsman when they do so much for wild life I just do not under stand.
Informal recreation shooting is expected to grow as the public increases their ownership of firearms. An indicator of increased need for recreational shooting can be drawn from the fact that, nationally, there were 16.4 million firearm purchaser background checks in 2011, up over two million from 2010.
Here in Nevada we enjoy all the open BLM land to explore, hunt, & shoot with few restrictions. This is a state where you can feel free from government restrictions, one where you can enjoy the outdoors often without seeing another person for days at a time. Let's keep Nevada BLM land open with no more added restrictions or off limit areas to shooting, hunting, or off road vehicle use. KEEP NEVADA BLM LANDS OPEN FOR ENJOYMENT is my final comment.
Hello, my name is Randy Halligan. I'm a resident of Carson City who enjoys the outdoors in a number of ways. Myself and my family will sometimes take a drive, a hike & picnic for a day. We may take the quads for some fun. Some days we go out to fish or hunt, sometimes camping. In the fall we go out and gather pinenuts. For all of these things I am truly grateful that I live in Nevada, a state with so much public land.
I've recently read so many things concerning the closure of roads and areas in federally owned lands being maintained by BLM and the Forest Service. I do not want to lose these areas and the quality of life they give to my family and I. Could you please provide me with information of what areas and roads BLM is looking at closing in Nevada? Can you also explain what reasons are behind the closures?
I know that in the past decade there has been a number of areas designated as Wilderness Areas in Nevada. At the beginning I could understand why it was being done even if I did not agree. I now believe this has gone too far and too much prime recreational areas have been taken away from the average person. Many people are not able to get back into the areas, not having horses or the health. Areas can be protected for the people without taking it away from the people.

Table C-15
Recreation and Visitor Services

First of all I would like to thank those whom work to keep our public lands open and accessible. My name is Edmun Santos and I live in Gardnerville. These are the important items to me with my Public Land use. I ride and hike the Pine Nut range, and go as far as Dog Skin Mountain for my recreation. I also like to watch event's in these Public Lands such as motor sports. I would like to have see more challenging single track, and sandwashes, for my recreation. I would like to express my satisfaction to the Staging area's now in use at the areas of my recreation and see no need for bathrooms, running water, etc. As far as maintenance I feel a clean up that includes public volounteers, is needed in some problem areas. Communiction however would be the challenge in this effort. At least getting the word out to the folk's that are willing to participate in these effort's. I would be willing to recieve e-mails. I also feel areas should be dedicated to certain uses to avoid conflicts that may cause a safety issue or dispute's between recreationist.
Also, in order to keep the OHV opportunities appealing to the general public the BLM should consider minimizing route closures when a route is determined to be closed, rerouting should be an option as to avoid the problematic area such as but not limited to: sensitive riparian areas, noise sensitive areas, critical sage grousse habitat, etc . Closures tend to eliminate "loops" and create dead-end roads which can take-away from the overall OHV experience. Countless OHV clubs frequently organize volunteer work parties dedicated to trail maintenance and re-routes, the BLM should consider using such resources when the BLM is unable to provide the resources themselves.
I'm writing in objection to the proposed restrictions to my land. Yes, my land. As a federal taxpayer, conservationist, and one who uses, protects and pays for the resource I am deeply concerned that you would consider restricting my recreational use of it. To use an archaic, unused forum of media (It's 2012) to publicize the meetings is as bad as the intent to make this seem like it is for the public good. It is not.

ISSUE 12: LANDS AND REALTY

Table C-16
Lands and Realty

General Development
Amenities like toilets ,loading ramps ,dry camping & developed camping areas should be built . A system of routes that connect the individual "special recreation areas" of the Pine nuts ,Wilson Canyon ,Smith Valley, Desert Creek, Middlegate, Sand Mountain ,Moonrocks ,Fort Sage ,Black Rock ,Nightengale that would inter connect them to encourage travel throughout the state.
4) New OHV staging area somewhere between/end of Stephanie and Johnson roads with toilet, an ATV/bike off-loading area, and a post board would be nice for the people at that end of the valley. The Single Tree staging area at Pine Nut Road past the dump needs a toilet and ATV/bike off-loading area. A basic pit toilet would work mainly for all the women that ride mountain bikes in this area. The ATV/bike off load can be made with railroad ties and fill so a truck can back up to it and roll their ATV/bike straight out. Many ATV/bike riders are killed just loading and unloading into their pickups using unsecured ramps. I have a backhoe and would donate my time to help out. This basin riding area needs to be limited to ATV's, motorcycles, mountain bikers, and hiking only (no jeeps, pickups, sand rails, etc.)

Table C-16
Lands and Realty

5) The staging/camping area just north of the dump on Pine Nut Road needs to be dedicated to the new and learning riders of ATV's, motorcycles, bicycles only. It is a great place for the younger kids to learn and has a track setup to ride on. This staging area also needs a toilet and unloading dock along with a post board. Again, I will offer my services to get this done.
9. Comment regarding Issue 19 as identified on the issues webpage; Sustainable Development BRC strongly opposes "sustainable development" as a Significant Planning Issue. There is nothing in FLPMA or regulations that direct the agency to incorporate this nebulous concern into their land use planning process. Because "sustainable development" is not sufficiently defined in BLM's materials, incorporating this issue as a Significant Planning Issue will require the agency provide additional opportunity for public input in order to comply with mandates requiring meaningful public input when formulating land use plans.
What criteria should be used to make habitat and populaon suitability and viability determinaons? If you have some horses that drink about 15 gallons of water a day, and you have solar projects that can use billions of gallons of water from an aquifer for just one project, or new mines and mining expansions that use a lot of water and you instruct mining companies to only do 10' and 20' water drawdown maps (instead of 1' and 5' water drawdown maps),and dig up tons of earth, or you're selling many acres of public lands for oil and gas leases, don't remove wild horses because of "degradation to the environment" or to keep a "thriving ecological balance." You will be perpetrating fraud against the American public by making this statement. You share an aquifer that doesn't stop at your BLM district office boundaries. If there isn't enough water or forage (because there isn't enough water) it is because the BLM is mismanaging land uses. For example, if you are worried about the drought, instead of fast-tracking solar projects, you should curtail them.
Lands and Realty- Public Lands
The haphazard nature of the BLM's right-of-way application process for renewable energy developments have led to a situation in which a comprehensive regional and landscape analysis of the impacts of these developments on species has not occurred. This RMP revision process must remedy this situation by analyzing and disclosing the present situation, as well as by identifying suitable and appropriate areas for further renewable energy development that would avoid or minimize impacts to species of concern and affected species. Comprehensive cumulative effects analysis must be a part of the decision making process in identifying areas suitable for renewable energy developments.

Table C-16
Lands and Realty

We specifically request that any future renewable energy development within the CCD address the following concerns:
o Be consistent with the direction and intent of the Nevada Energy and Infrastructure Development Standards to Conserve Greater-Sage Grouse Populations and Their Habitats4
o Minimize the projects' ecological footprints; site renewable projects on previously disturbed lands;
o Avoid steep slopes in order to reduce erosion impacts;
o Avoid sensitive and rare natural communities;
o Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors;
o Require structures that discourage perching by raptors;
o Avoid fly-ways, especially for raptors;
o Avoid development of priority areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, regional conservation plans, recovery plan needs for threatened and endangered species, and Audubon IBAs;
o Avoid impacts to species of plants and animals listed under the state administrative code and the ESA;
o Avoid local, state, or federally protected lands;
o Minimize growth-inducing impacts;
o Be consistent with the conservation priorities of existing land management and conservation plans;
o Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities;
o Minimize cumulative impacts due to existing and planned development in the region;
o Actively restore native vegetation to the project footprints after the infrastructure has been constructed.

4 http://ndow.org/wild/conservation/sg/resources/nevada_energy_standards_for_sage-grouse_2010.pdf

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We strongly disfavor the development of wind power facilities, or associated infrastructure, roads or transmission lines, in areas that will destroy, degrade or fragment important wildlife habitats. Roads and other linear disturbances present a particular challenge to wildlife in the form of habitat fragmentation. Continued habitat fragmentation forces wildlife to live on ever-shrinking islands of habitat, where it is more difficult for them to find food, water, shelter, mates, and protection from predators. Genetic problems such as inbreeding appear, and populations become more susceptible to catastrophic events such as wildfire. The resulting fragmented habitat inevitably leads to smaller populations of wildlife, and extirpation of populations or complete extinction of species becomes more likely. Renewable energy projects should be sited to utilize existing rights-of-way.

Rights-of-Way: The RMP should evaluate existing rights-of-way. Unused or no longer needed rights-of-way should be revoked and, if disturbed, should be rehabilitated. Any new rights--of-way should be located in already disturbed areas, such as along roads, as much as possible, avoiding potential losses and fragmentation of intact sagebrush habitats. Utilities should be consolidated into existing rights-of-way, as much as possible. Core priority habitats for the Greater Sage Grouse and other TES species should be excluded and/or avoided for rights-of-way.

Land Tenure Adjustments: No public lands which provide core priority habitat for Greater Sage Grouse should be designated for disposal or, if formerly designated in existing land use plans, should be withdrawn from disposal designation in the new RMP for the CCD. Public land disposals should be limited to the needs of land-locked communities. Checkerboard lands should be consolidated through exchange and purchase. No lands which provide critical wildlife habitat should be disposed.

Table C-16
Lands and Realty

The RMP should also address acquisition, preservation and restoration of property along the Truckee River and its tributaries as a priority to preserve this important natural resource.
7. Identification of Public Lands for Disposal The BLM must evaluate the sustainable capacity of the resources to support the expanded growth of these areas to be disposed. Of primary concern is the level of sustainability with regards to water needs. Growing scientific evidence is making it clear that the level of groundwater needs for continued growth. Any areas identified for disposal must be encumbered with the assurance that comprehensive NEPA will conducted prior to any conveyance of the land.
We hope BLM will avoid geothermal, solar and wind energy development in areas and habitats where such development will not be compatible with the habitats for listed or candidate species (both federal and state), and BLM special status species.
I request that all lands in Storey County that are within the boundaries of the two historic designations, be withdrawn from disposal until more of the public can be involved in the decision.
BLM was an active participant in assisting us develop the adopted Washoe County Regional Open Space & Natural Resource Management Plan. The Plan and its components address future trail access and corridors; recommended buffers for sensitive natural and cultural resources; future lands for acquisition; recreational,visual, scenic, and water resources. We request that this approved plan and its components be incorporated into the RMP where possible, especially when considering future R&PP properties, disposal lands and providing regional trail connectivity between BLM and Washoe County trail/park systems.
Acquire through right agreements for long term travel through private and BIA property.
The BLM is a multiple-use agency and among many activities, hunting and recreational shooting are - and must be - allowed. However, in recent years, you have been systematically closing large areas of public lands to recreational shooting. Please do NOT adopt even more lands. Please do NOT further degrade hunting/shooting on public lands.

Table C-16
Lands and Realty

There are many Smith and Wellington residence that would like to utilize "The old dump site" located at Section 4 1/4 of SW 1/4, Range 24 East, Township 11N as a shooting range for shotguns, small arms and archery. This property was previously a local landfill used from 1950's through 1992. Lyon County managed the property during that period. It has been fenced, gated and locked after it was covered over in 1992. Lawrence Smith and I met with Erik Pignata on April 20, 2012 at the BLM - Carson City Office to review a proposed usage and site visit of this property.

Since the shooting enthusiasts located in the Smith Valley area are looking for topical land use, this site would be ideal. The area is level which will aid in the organizations reclamation plans. The property is isolated from residential properties and livestock areas and backed by a large portion of BLM property.

Although this property has not been previously identified for disposal, it would be a good longterm use for the community in an accessible, yet isolated area. Thank you for considering this previously county used property for disposal during the RMP Process.

Land Tenure
In terms of lands and realty, which the BLM may ultimately dispose of, it is important to recognize roads, ways and trails that have long been used by the public and to which the public may likely have acquired a prescriptive right-of-way. We suggest that title documents include language to preserve such rights-of-ways, such as "subject to the rights of the public to utilize roads presently existing and to which the public has acquired a prior statutory right to use."

In the past, before the Lucerne and Billy the Kidd mines became patented, BLM was requiring an EIS from Oliver Hills in 1992. Prior to that Houston Oil and Minerals was denied a permit for a heap-leach operation in American Flat. Comstock Mining Incorporated (CMI) has, cleverly avoided any level of an EIS and even withdrew a ROW application because it would have led an environmental analysis. NDEP granted permits without a hint of concern about mining in the only NPL Superfund site in Nevada. Early on when questioned about this NDEP's response was, "well, that area was stepped on before". EPA has, reluctantly, finally become involved. There are serious hazardous materials in this area that have been grossly mismanaged. BLM has, so far, been the only agency to take these issues seriously, it would be a mistake to turn over management of these sensitive lands to political processes that will not protect them.

To further clarify some of the environmental issues we have cut and pasted one of the last letters we sent to EPA concerning the environmental hazards.

We would like to comment on the RMP and EIS that was published in the Federal Register on 2/24/2012. We live, work, own property and have businesses in the Virginia City Historic Landmark. This Landmark designation was originally intended to\ protect our historic district from surface mining. It, unfortunately, has little regulatory authority, although, it is administered by the US Park Service. This area roughly coincides with the Carson River Mercury Superfund Site (CRMS); know to contain 15 million pounds of missing mercury as well as unquantified amounts of lead and arsenic, used in historic milling processes. We strongly urge that any public lands in the CRMS and the Virginia City Historic Landmark be kept under BLM management. Neither the State of Nevada or Storey County have shown an ability to be stewards of this historic and environmentally contaminated area.

In particular, future plans for the Sun Valley Rim Trail and Canoe Hill Trail System, which are greatly desired by the public, are very dependent on cooperative participation by BLM and should be included in the RMP. If these trail corridors could be addressed with the Environmental Assessment associated with the RMP, it would greatly assist Washoe County and our community partners on these projects. At minimum, if these important trail systems were included in the RMP for future accommodation, it would be greatly appreciated by our agency, our partners, and for future generations. We recommend that T20 R21 S19, 30, 31; T19 R21 S5, 6, 7, 8 be retained to accommodate the Canoe Hill Trail System or possible considered for R&PP designations. This is near a sensitive cultural area, but is in great need for managed recreation to reduce current user conflicts and on-going safety issues with congested area shooting and recreation participants.

Table C-16
Lands and Realty

Currently, an eight (8) mile "social trail" exists on T20North R21East, sections 19, 30, and 31, which is adjacent Golden Eagle Regional Park (GERP), to the southwest. The GERP is operated by the City of sparks on land that is leased from the BLM through an R & PP lease. At the south end of GERP, the Pah Rah Trailhead has been established, and is recognized as a Washoe County Regional Parks and Open Space Trailhead. The CHTA has been working with the BLM by proposing to expand the Pah Rah Trailhead by conducting improvements on and expansion of the existing social trail network.
2. I believe that the public lands should afford as many uses as possible. If an activity, or a use, creates conflict with the community or another user, then regulations need to be considered and prioritized to avoid such conflicts. However, regulation should not be so restrictive as to prevent, or prohibit any legal activity on public lands.
CVTA also supports retention of those areas around this proposed trail system to remain in public ownership, whether by BLM or Douglas County for the future enjoyment of all users. These lands are used extensively by many recreational user groups and activities. Retaining the open landscape and character of the area will protect fauna and flora resources, preserve historical an cultural values, keep viewscapes intact, and maintain public access to current urban front areas.
Another concern I have is the checkerboard pattern of private ownership throughout what appear to be numerous parts of Nevada. I understand the odd ownership pattern may be associated with the railroad. My concern is that fencing of the private land could severely impact access to public lands for all types of users, including BLM staff. This is a tremendous long-term management risk and the BLM should make a concerted effort to purchase private property on key roads to preserve long-term access.
The proposed trail system currently goes through areas identified by the BLM as potential disposal areas. CVTA recommends a minimum of 600 feet of trail corridor per each side of the trails to be retained in BLM management if future BLM land disposals were to occur. This protects the trails while preserving a wildlife and open space corridor. The following locations are where the proposed trail system and identified potential BLM disposal areas overlap: McTarnahan Hill Quad, Southeast quarter of section 26, T.14N, R. 20E McTarnahan Hill Quad, East half of section 35, T. 14N, R. 20E McTarnahan Hill Quad, East half of section 1, T. 13N, R. 20E Gardnerville Quad, Southwest quarter of section 28, T. 13N, R. 21E Mt. Siegel Quad, Southwest quarter of section 11, T. 12N, R. 21E.
Personal feelings aside I urge you to take the Storey County BLM lands off the list of disposable properties. Our valuable Historic Landmark and the state Historic District need all the federal oversight and protection they can get, and so do those of us who live here.
Lands and Realty Sensitive lands and resources should be retained in federal ownership. Sensitive lands and resources that would benefit the public should be purchased from willing sellers as the opportunity arises. Acquisition of inholdings within existing Wilderness Study Areas or future wilderness areas or ACECs and other special areas should be given a high priority when opportunities with willing sellers occur. When these lands are acquired, they should be managed in the same manner as the adjacent public lands.
The CHTA remains committed to continued work with the BLM to protect the existing social trail and add additional new trail. It is hoped that these comments are added to the current RMP update process. These comments call for BLM lands (T20North R21East, sections 19, 30, and 31) to be identified within the update as a recreation corridor and potentially identified in a future R & PP lease as a natural, desert park that consists of open space and a trail network.

Table C-16
Lands and Realty

We specifically request that the following screens be used to eliminate lands to be considered for disposal: oAreas with sensitive and rare natural communities, including sage grouse category 1 and 2 areas; o Areas identified as important for species in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, Audubon's Important Bird Areas, regional conservation plans, and recovery plan areas for threatened and endangered species; o Areas that provide habitat for species of plants and animals listed under the state administrative code and the ESA; o Areas that serve as corridors for species movements between key habitat requirement areas and corridors needed to accommodate genetic flow and for climate change adaptation.
There is also demand for a Motocross facility somewhat like the arrangement at Stead .Douglass county has expressed a desire to Manage such a track The City of Dayton has also expressed a desire for a track and already advertises out of state for OHV recreationists to "discover Dayton".Perhaps BLM can give The county a parcel off of Sunrise Pass rd. in an ammendment to the Douglas County Lands Bill a couple miles out from residential areas . The Pinenuts and other areas in the RMP are a major draw to the area and contribute to local jobs and our economy .Visitors buy gas, eat at our resturaunts ,sleep at our motels & hotels/casinos ,they buy parts & accessories, have repairs done & buy vehicles at our Motorsports dealers & independent shops.They have their trucks & RV's towed & repaired here .
ENERGY (Wind, Solar, Geothermal) 2. ISSUE: The designated utility corridor along Heybourne Road that would carry the Blackhawk to Heybourne power line cuts through subdivisions that weren't on the books when the corridor was designed in the old RMP Although the Blackhawk to Heybourne power line has been put on hold at the request of NV Energy, the utility corridor that would house this power line and others still exists. When the corridor was designated, none of the subdivisions it passes through were built - most weren't on the books. These now exist. Whenever a line is constructed as it eventually will be in the corridor, it will lower property values. Existing small power lines in this corridor have caused prime building lots in Saratoga Springs to remain unsold- even during the development boom years of the early 2000's. Retaining this utility corridor which will allow construction of a line like the Blackhawk will create an OHV circuit through residential areas that doesn't currently exist, will impact a federally listed species habitat and may create health hazards.
Magma concurs with the concept of Identifying and designating predominantly active geothermal areas as priority land areas In order to streamline permitting, with the ultimate goal of developing and producing geothermal resources In a more expeditious manner In order to coincide with industry's business and financial goals, while at the same time protecting pertinent resources.
Please take the Storey County BLM lands off the list of disposable properties. Help us create a buffer zone that will protect our history, our wild animals, our high desert mountains, our health, our homes, our businesses, the V&T Railroad, and the value of our properties, businesses and other worthy and unique enterprises that keep our Nevada history and culture alive for future generations.

Table C-16
Lands and Realty

Scoping Handout - 4.1 Areas of Critical Environmental Concern

I propose that all legal HA Wild Horse and Burro range land be designated as Areas of Critical Environmental Concern and be managed principally for wild horses and burros as per the 1971 Congressional Act and for BLM to utilize their discretion under 43 C.F.R. 4710.5(a) to close livestock grazing in the Has and/or or designate this area to be managed principally for wild horse herds under 43 C.F.R. 4710.3-2. Due to past management practices of the Has Wild Horses and Burros are now in grave jeopardy of losing their genetic viability as well as their designated legal land. This can be largely rectified by BLM following the law and providing these species their designated and legal land as a principle resource. This can be done even as the land is used within a multiple use policy – but the BLM must make it's decisions on proven scientific research and not on politically driven pressure from financial interests such as mining, trophy hunting, livestock and energy corporations. These special and legal management objectives must be immediately and continually put into effect in order to protect these special and unique resources.

In Lyng v. Northwest Indian Cemetery Protective Association, 485 U.S. 439, 452-53 (1988), the Supreme Court warned against imposing "religious servitudes" over public lands, stating, "No disrespect for these practices is implied when one notes that such beliefs could easily require de facto beneficial ownership of some rather spacious tracts of public property. Even without anticipating future cases, the diminuation of the Government's property rights, and the concomitant subsidy of the Indian religion, would in this case be far from trivial: the District Court's order permanently forbade commercial timber harvesting, or the construction of a two-lane road, anywhere in the area covering a full 27 sections (i.e. more than 17,000 acres) of public land."

Some citizens hold religious beliefs that man is God's highest creation; that man is steward of nature; that man is to improve nature and make it fruitful for the benefit of man; and that it is idolatry to worship creation. Should we then give these citizens exclusive access?

Even the dissent in Lyng recognized that asking the government to restrict private parties' access to public lands for religious reasons is patently unlawful. Justice Brennan wrote, "Should respondents or any other group seek to force the Government to protect their religious practices from interference of private parties, such a demand would implicate not only the concerns of the Free Exercise Clause, but those of the Establishment Clause as well."

In a Draft RMP released for public review recently in Idaho, several recreation management "standards" and "objectives" seem to represent a wholly one-sided paradigm, providing exclusive access and special favor for a certain religion, and excluding opposing religious and non-religious considerations. The tribal religion-based restrictions in the Draft were presumed good. Other uses based on other beliefs/non-beliefs and philosophies were presumed bad.

Please do not misunderstand our comment here. Our members do not wish to hinder activities that are important to members of tribes. Our members believe management via the multiple use/sustained yield paradigm need not conflict with the tribal uses and values.

Transportation Facilities

However, we need to limit access of ATVs. ATVs degrade habitat as well as impact wildlife. We need uninterrupted wild areas to allow our wildlife to flourish. Please take this into consideration.

Utilities

No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance.

ISSUE 13: MINERAL RESOURCES (INCLUDES OIL, GAS, GEOTHERMAL, COAL, SALEABLE, AND SOLID LEASABLE EXCEPT COAL), AND LOCATABLE

Table C-17
Mineral Resources

Energy Development - General
BRC believes that resource development is compatible with semi-primitive recreational values and opportunities. We have seen cases where the oil and gas industry operates with little or no impacts on other resource values. There is a relatively high tolerance for oil and gas activities among those who enjoy OHV recreation. We do not support a no-lease or no-surface-occupancy stipulation for areas allocated to semi-primitive recreation. The BLM has a Congressionally-mandated multiple-use mission, which must be upheld and not compromised by the single-use land management objectives promoted by certain interest groups. A comprehensive analysis of the socioeconomic benefits of energy and mineral development activities in the area should be included in the analysis. When developing energy and mineral resources, impacts to recreational uses must be evaluated. Where recreation is negatively affected, the agency should mitigate the loss of recreational uses. Mitigation may mean a variety of actions, including developing new recreational opportunity in other areas. At least one alternative should include an aggressive recreational mitigation directive for energy and mineral development.
The biggest problem in "managing" public lands is keeping them public and not trashed by energy companies, developers, cattleman, etc. with the big money to hire lobbeys who add riders on to bills allowing the trashing to continue. This is how the wild horse issue has become so dire. The horses are supposed to be "free ranging" and the BLM has be packed with special interest people who want the land the wild horses live on so they are no longer "free ranging", rather, kept like zoo animals in designated areas by killing, rounding up and penning, etc, in order to give their land to the people who pay congress to add those nasty riders on to bills that allow this mismanagement to continue. The word is getting out when we all see how the wild horses are being trashed by the corrupt BLM and the fight has just begun to return these horses their free ranging status as originally intended. The BLM doesn't round up deer, elk, antelope, etc. and put them in pens... neither should they round up horses.
2) Public/private cooperatives Public/private cooperative arrangements must adhere to all standards as any contractual agreement and must be made available for public comment and competitive bid. Any public cooperative that requires removal, handling or range repair (springs, fencing) must be reviewed carefully against any standard of conflict of interest. No livestock grazing permittee should hold any permit to remove wild horses from any public land. The language in the standing RMP (quoted below) must be enforced with the recognition that this language applies to all permitted activity, including extractive industry. Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly.

Table C-17
Mineral Resources

3. Comments on document 10.2 "minerals" and 10.3 "geothermal development"

The BLM wants your input...
• How should mineral development be managed to minimize resource conflicts?
• Are there public lands that should be withdrawn from mineral entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on mineral development? If so, what are they and where should they be applied?
• What are the potential social and economic effects associated with mineral development? How would planning decisions affect communities in the Carson City District? How can the BLM improve the management of geothermal resources?
• How should geothermal development be managed to minimize resource conflicts?
• Are there public lands that should be closed to geothermal entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on geothermal development? If so, what are they and where should they be applied?

BRC supports reasonable development of our natural resources, including minerals, oil and\ gas and "renewables," such as geothermal, wind and solar. Generally, there is support among our members and supporters for development mineral resources and of oil and gas resources in the planning area. There is a high degree of confidence in BLM's ability to regulate this activity so that it is both economically feasible and environmentally sound.

A significant percentage of our members live in rural areas of Nevada and California. The jobs associated with oil, gas and mineral development are highly valued. Indeed, many of our members make their living either directly involved in the oil and gas business, mining, power generation, or in related "service" businesses. Oil, gas and mineral development has important social and economic benefits at the national and state level as well. These benefits are reduced or eliminated when natural resource development is prohibited or severely restricted.

ENERGY (Wind, Solar, Geothermal)
2. ISSUE: The designated utility corridor along Heybourne Road that would carry the Blackhawk to Heybourne power line cuts through subdivisions that weren't on the books when the corridor was designed in the old RMP Although the Blackhawk to Heybourne power line has been put on hold at the request of NV Energy, the utility corridor that would house this power line and others still exists. When the corridor was designated, none of the subdivisions it passes through were built - most weren't on the books. These now exist. Whenever a line is constructed as it eventually will be in the corridor, it will lower property values. Existing small power lines in this corridor have caused prime building lots in Saratoga Springs to remain unsold- even during the development boom years of the early 2000's. Retaining this utility corridor which will allow construction of a line like the Blackhawk will create an OHV circuit through residential areas that doesn't currently exist, will impact a federally listed species habitat and may create health hazards.

Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage--grouse seasonal habitats.

The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage--grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations.

Energy (Wind, Geothermal, Solar, etc.)
Without regard to specific renewable energy sources and target locations, our public lands should not be preemptively closed or overlaid with use-limiting designations so as to prohibit future implementations of renewable energy sources.

Table C-17
Mineral Resources

Right of Way (ROW) and Renewable Energy NDOW understands and recognizes BLM's mandated role to process ROW applications. We encourage the BLM to establish a framework in the RMP providing measures on surface and subsurface occupancy for renewable and non-renewable resources and encourage a protection buffer occur around each WMA.
New rights--of--way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended.
Energy Development - Geothermal
Following are specific answers to questions listed in the RMP 10.2 Geothermal Resources Fact Sheet: How can the BLM improve the management of geothermal resources? The RMP must include a detailed analysis of water usage for geothermal developments. This must include site specific information regarding each water source, aquifer and the water sources the development will directly or indirectly impact over the short- and long-term.
No Mining, Drilling, Fracking or ROWs in HAs and HMAs CCDO should close the HAs and HMAs to geothermal and fluid-mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration, and mining. Wild horses and burros should have peace in the areas designated for them to live. Rightso-f-Way should be avoided and routed around the HAs and HMAs.
Declare HMAs closed and off-limits to geothermal/fluid mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration and mining. Recreational vehicle activity should be minimized, as its damaging effect on range conditions has been widely documented
Magma concurs with the concept of Identifying and designating predominantly active geothermal areas as priority land areas In order to streamline permitting, with the ultimate goal of developing and producing geothermal resources In a more expeditious manner In order to coincide with industry's business and financial goals, while at the same time protecting pertinent resources.
One such example would be a proactive approach to lease stipulations. Currently, stipulations often times state a precise restrictive measurement. As an alternative, lease stipulations could Identify the area of concern and then provide language giving the BLM authorization discretion based upon the proposed activity. This language would continue to provide for the preservation of the area of concern, while at the same time afford a more flexible approach to proposed activities that may otherwise fall within a restrictive measurement.
Likewise, water guzzling energy projects should not be allowed on HMAs or HAs. In this day and age, it is simply out of the question to allow projects that are water intensive to proceed on water-challenged public lands. We recommend that if geothermal projects are allowed, it should only be with a legal assurance from the developer that there will be adequate water for all wildlife, including wild horses and burros and that the land will eventually be restored to its pre-development state or in a better state than when development began. Livestock should be removed immediately if a permittee repeatedly ignores the rules of the permit as has apparently been the case in western Nevada. Bullying the BLM should not be permitted. It goes without saying that a permittee who defies the Agency and knowingly continues to break the terms of his agreement should have his livestock confiscated.

Table C-17
Mineral Resources

In general, it would be beneficial for the Resource Management Plan to provide for a consistent common-sense approach to geothermal permitting on public lands, in addition, the plan should be flexible and In the best Interest of all parties involved due to the uniqueness of each geothermal project area. Such a plan would be reflective of the current philosophy of the Carson City Field Office, which Magma has found advantageous. It would also lay the framework for and assist In guiding future BLM and geothermal industry personnel in accomplishing geothermal activities.
Energy Development - Oil & Gas
No Mining, Drilling, Fracking or ROWs in HAs and HMAs CCDO should close the HAs and HMAs to geothermal and fluid-mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration, and mining. Wild horses and burros should have peace in the areas designated for them to live. Rightso-f-Way should be avoided and routed around the HAs and HMAs.
Minerals and Mining
3. Over 2,000 persons live in the Comstock Historic District (includes Gold Hill, Virginia City, and Silver City), which has long been designated as having Historic Landmark status by the National Park Service. The current Landmark status is already threatened because of mining activities in the historic mining corridor between Gold Hill and Silver City. Loss of Landmark status would negatively impact tourism to the area, and could impact V&T Railroad operations, as well.
Are there public lands that should be withdrawn from mineral entry because of conflicts with other public land uses? AWHPC urges the BLM to withdraw HAs and HMAs from mineral development because it negatively impacts wild, free-roaming horses and burros and infringes on the public's ability to enjoy these animals in their natural environment. Mineral development is known to increase vehicle traffic, creates environmental noise which is detrimental to wildlife such as wild horses and burros and creates a public nuisance.
AWHPC urges that the RMP declare HMAs closed and off-limits to geothermal/fluid mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration and mining. Recreational vehicle activity should be minimized, as its damaging effect on range conditions has been widely documented. By eliminating or greatly reducing the commercial operations within herd areas and herd management areas -negative impacts, such as surface destruction and the large consumption of water, will be minimized allowing the agency to better protect and manage wildlife -including wild horses and burros.

Table C-17
Mineral Resources

Following are specific answers to questions listed in the RMP 10.1 Minerals Fact Sheet:
How should mineral development be managed to minimize resource conflicts?

The RMP must mandate the full disclosure of water usage and how that water usage impacts springs and other water sources in and around the area. Mineral development must be managed with an understanding of the implications that the development has on water aquifers and the impact that reduction of water has on the greater habitat.

We urge the Carson City District for cease the issuance of permits and leases for mineral extraction in and around HAs and HMAs due to the significant environmental degradation and tremendous water usage involved in such operations. It is ironic that the BLM blames wild horses and burros for the usage of water while the agency permits minimal leases to utilize quantities many times over what any wild horses and burros could possible use.

The RMP must mandate the full disclosure of all water usage for any mineral development - including but not limited to specific aquifer information, identification of springs and water sources impacted by the aquifers, all short- and long-term impact the use of water may have from any given area, etc.

2) Public/private cooperatives
Public/private cooperative arrangements must adhere to all standards as any contractual agreement and must be made available for public comment and competitive bid. Any public cooperative that requires removal, handling or range repair (springs, fencing) must be reviewed carefully against any standard of conflict of interest.

No livestock grazing permittee should hold any permit to remove wild horses from any public land.

The language in the standing RMP (quoted below) must be enforced with the recognition that this language applies to all permitted activity, including extractive industry.

Designated wild horse and burro ranges are devoted primarily to the protection and preservation of wild horses or burros. This means that other uses may be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly.

In the past, before the Lucerne and Billy the Kidd mines became patented, BLM was requiring an EIS from Oliver Hills in 1992. Prior to that Houston Oil and Minerals was denied a permit for a heap-leach operation in American Flat. Comstock Mining Incorporated (CMI) has, cleverly avoided any level of an EIS and even withdrew a ROW application because it would have led an environmental analysis. NDEP granted permits without a hint of concern about mining in the only NPL Superfund site in Nevada. Early on when questioned about this NDEP's response was, "well, that area was stepped on before". EPA has, reluctantly, finally become involved. There are serious hazardous materials in this area that have been grossly mismanaged. BLM has, so far, been the only agency to take these issues seriously, it would be a mistake to turn over management of these sensitive lands to political processes that will not protect them.

To further clarify some of the environmental issues we have cut and pasted one of the last letters we sent to EPA concerning the environmental hazards.

Table C-17
Mineral Resources

Minerals (Hardrock, Oil & Gas) Without regard to specific mineral resources and target locations, our public lands should not be preemptively closed or overlaid with use-limiting designations so as to prohibit future mining operations.
No Mining, Drilling, Fracking or ROWs in HAs and HMAs CCDO should close the HAs and HMAs to geothermal and fluid-mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration, and mining. Wild horses and burros should have peace in the areas designated for them to live. Rightso-f-Way should be avoided and routed around the HAs and HMAs.

Table C-17
Mineral Resources

- Areas Identified as "Important Bird Areas" ("IBA")

Important Bird Areas, or IBAs, are sites that have been identified under the auspicious of the Audubon Society that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. IBAs may be a few acres or thousands of acres, but usually they are discrete sites that stand out from the surrounding landscape.

To qualify as an Important Bird Area, sites must satisfy at least one of the following criteria. The site must support:
o Species of conservation concern (e.g. threatened and endangered species)
o Restricted-ranges species (species vulnerable because they are not widely distributed)
o Species that are vulnerable because their populations are concentrated in one general habitat type or biome
o Species, or groups of similar species (such as waterfowl or shorebirds), that are vulnerable because they occur at high densities due to their congregatory behavior

Identification of a site as an IBA indicates its unique importance for birds. The IBA identification process provides a data-driven means for cataloging the most important sites for birds throughout the country and the world. The use of a hierarchical classification system further helps to establish priorities for conservation efforts.3

On the CCDS there are at least five IBAs that have been identified and recognized as important at the state level:
o Lahontan Valley Wetlands IBA
o Carson River Delta IBA
o Swan Lake IBA
o Walker Lake IBA
o Mount Grant IBA

For a detailed description of the sites, their valued and unique features and the factors threatening them, refer to the Audubon website at: http://iba.audubon.org/iba/siteSearch.do .
Many land uses may be compatible with recognition of an ACEC designed to protect the vulnerable features of a particular IBA, and the primary focus should be on maintaining the integrity and function of the area.

All ACECs should have surface occupancy and mineral rights withdrawn, and federal water rights protected to ensure their integrity and site characteristics.

3 For further information, see: http://web4.audubon.org/bird/iba/iba_intro.html

Regarding any effort to transfer BLM land holding in Storey County to the County Government, to private entities, to corporations, to mining companies, or to the State of Nevada, we respectfully request that Storey County BLM lands should be withdrawn from mineral entry regardless of future ownership.

The reason being as follows:

Table C-17
Mineral Resources

Mineral Resources: Core priority habitats for Greater Sage Grouse and other TES species should be withdrawn from mineral entry. Seasonal and other restrictions should be required as conditions of permit approval to protect other wildlife habitat and cultural resources.
5. Comments regarding "managing renewable energy development for geothermal, solar and wind" and "managing minerals" (all energy development)" Potential impacts to road, trails and areas used for recreation of renewable energy development should be disclosed in the analysis. All Alternatives should include direction to mitigate for any potential loss of recreational opportunity from future renewable energy development.
Declare HMAs closed and off-limits to geothermal/fluid mineral leasing, mineral allocations, locatable mineral development, gas and oil exploration and mining. Recreational vehicle activity should be minimized, as its damaging effect on range conditions has been widely documentedF
Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development.
Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage--grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage--grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations.
Personal feelings aside I urge you to take the Storey County BLM lands off the list of disposable properties. Our valuable Historic Landmark and the state Historic District need all the federal oversight and protection they can get, and so do those of us who live here.
The situation regarding surface mining on the Comstock is fraught with complexity, but one bedrock fact seems clear: this ground was poisoned with mercury. No-one knows exactly where it is, but anecdotally it is in American Creek and other places the local kids play. And no-one knows how much is out there, although it is thought that some 7,500 tons of mercury accumulated in the soils of the Carson River Mercury Superfund site, along with unknown quantities of arsecic and lead. But we do know that disturbing in the dirt as CMI is now so busily doing is what makes these toxins so damaging to human health. Left alone they do no harm so long as they stay out of the waterways. But once dispersed into the air, these substances move with the wind and settle into our homes and our waterways -- and onto the steaks we're grilling in the back yard.
BRC believes that resource development is compatible with semi-primitive recreational values and opportunities. We have seen cases where the oil and gas industry operates with little or no impacts on other resource values. There is a relatively high tolerance for oil and gas activities among those who enjoy OHV recreation. We do not support a no-lease or no-surface-occupancy stipulation for areas allocated to semi-primitive recreation. The BLM has a Congressionally-mandated multiple-use mission, which must be upheld and not compromised by the single-use land management objectives promoted by certain interest groups. A comprehensive analysis of the socioeconomic benefits of energy and mineral development activities in the area should be included in the analysis. When developing energy and mineral resources, impacts to recreational uses must be evaluated. Where recreation is negatively affected, the agency should mitigate the loss of recreational uses. Mitigation may mean a variety of actions, including developing new recreational opportunity in other areas. At least one alternative should include an aggressive recreational mitigation directive for energy and mineral development.

Table C-17
Mineral Resources

This is a very hot issue with the residents. Canvassing of the area shows that over 90% of the residents oppose open pit mining, which is the only economically viable way to get what gold is left. There must be more public discussion with residents. I understand that you are trying to involve the public, but the BLM needs to be more proactive in that regard. We would like a representative to meet with more residents up here to learn about this.

3. Comments on document 10.2 "minerals" and 10.3 "geothermal development"

The BLM wants your input...
• How should mineral development be managed to minimize resource conflicts?
• Are there public lands that should be withdrawn from mineral entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on mineral development? If so, what are they and where should they be applied?
• What are the potential social and economic effects associated with mineral development? How would planning decisions affect communities in the Carson City District? How can the BLM improve the management of geothermal resources?
• How should geothermal development be managed to minimize resource conflicts?
• Are there public lands that should be closed to geothermal entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on geothermal development? If so, what are they and where should they be applied?

BRC supports reasonable development of our natural resources, including minerals, oil and gas and "renewables," such as geothermal, wind and solar. Generally, there is support among our members and supporters for development mineral resources and of oil and gas resources in the planning area. There is a high degree of confidence in BLM's ability to regulate this activity so that it is both economically feasible and environmentally sound.

4. We understand from talking with our U.S. Congressional delegation staffs that land deals are meant to grow politically from the grass-roots upward to legislators, and that the community should support the proposed plan. This is not the case in terms of Lyon and Storey County residents. Our Planning Commission and Board of Commissioners has for over a year now pursued opening our traditionally historic tourist town to open pit mining in spite of the overwhelming opposition of residents, as stated in public hearings, planning commission meetings, written comments, and yard signs.

Fossils a fragile non-renewable resource deserving responsible conservation The timestamps left by the paleontological resources in the management area, whether they be impressions of Jurassic ammonoidea, permineralized wood or bones from Pliocene fauna, have proven to be vital as biostratigraphic markers in unravelling the lithographic puzzle of the Basin and Range to Sierra Nevada transition zone. These resources are fragile and deserve conservation efforts, including the courage to relocate the Pinenut Common Use Area gravel pit and subject ongoing mineral resource extractions to the requirements of the National Environmental Policy Act. Circumventing good decision-making procedures by relying on decisions made in ignorance prior to the legislative demands is not responsible conservation.

I am a registered voter in the state of Nevada. I am deeply concerned about the bias shown to proprietors and private interests versus the wildlife and public interests when it comes to the management of our public land. Wild horses and burros should not be removed only to make way for the land to be leased for cattle grazing or mining. It completely discredits the claim that there is not enough food or water.

Table C-17
Mineral Resources

We would like to comment on the RMP and EIS that was published in the Federal Register on 2/24/2012. We live, work, own property and have businesses in the Virginia City Historic Landmark. This Landmark designation was originally intended to protect our historic district from surface mining. It, unfortunately, has little regulatory authority, although, it is administered by the US Park Service. This area roughly coincides with the Carson River Mercury Superfund Site (CRMS); know to contain 15 million pounds of missing mercury as well as unquantified amounts of lead and arsenic, used in historic milling processes. We strongly urge that any public lands in the CRMS and the Virginia City Historic Landmark be kept under BLM management. Neither the State of Nevada or Storey County have shown an ability to be stewards of this historic and environmentally contaminated area.
I request that any Storey County BLM lands should be withdrawn from mineral entry regardless of future ownership. Much of Storey County lies within the Comstock Historic District, The Virginia City National Historic Landmark, and a Carson River mercury superfund site. The towns of Silver City, Gold Hill, American Flat and Virginia City are residential and business areas, getting much of their revenue from local commerce and the tourist trade. Recent mining in the last 20 or 30 years, has provided very little, if any revenue to this area. Instead, it has degraded the area through the destruction of the historic landscape through open pit mining and exploration.
It's not that we look down on the services of mining industry or miners, it is just not appropriate in a Superfund site where airborne mercury could be carried on the wind, caused by the ever-present dust of mining and mining exploration. And it's not appropriate in one of America's largest historic districts, and certainly not in a historic town with National Landmark status. The Comstock and surrounding BLM lands should be off limits to any disturbance that is damaging to our national reputation, that does not fit with our historic character and mission, and that poses serious risks to our health.
5. Polls (and the prevelance of "No Open Pit Mining" signs) show that 80% of residents are against mining, and against any other kind of development that does not fit with the historic mining atmosphere and period activities which are bread and butter to most commercial businesses. Recently, a project that would have sited wind farms on the Mt. Davidson ridge not approved for the same reasons residents are against mining here.
A significant percentage of our members live in rural areas of Nevada and California. The jobs associated with oil, gas and mineral development are highly valued. Indeed, many of our members make their living either directly involved in the oil and gas business, mining, power generation, or in related "service" businesses. Oil, gas and mineral development has important social and economic benefits at the national and state level as well. These benefits are reduced or eliminated when natural resource development is prohibited or severely restricted.

ISSUE 14: HAZARDOUS MATERIALS

Table C-18
Hazardous Materials

The situation regarding surface mining on the Comstock is fraught with complexity, but one bedrock fact seems clear: this ground was poisoned with mercury. No-one knows exactly where it is, but anecdotally it is in American Creek and other places the local kids play. And no-one knows how much is out there, although it is thought that some 7,500 tons of mercury accumulated in the soils of the Carson River Mercury Superfund site, along with unknown quantities of arsecic and lead.

But we do know that disturbing in the dirt as CMI is now so busily doing is what makes these toxins so damaging to human health. Left alone they do no harm so long as they stay out of the waterways. But once dispersed into the air, these substances move with the wind and settle into our homes and our waterways -- and onto the steaks we're grilling in the back yard.

Table C-18
Hazardous Materials

How should BLM address wild horse and burro urban-interface issues?

How about considering CUMULATIVE use in the area when using 2,4-D? Consider this:

The EPA says that 2,4-D is seventh largest source of dioxin in the U.S.

Dioxin DCDD that contaminates 2,4-D herbicide is not tested, measured or monitored by the EPA, or even regulated. A Canadian research paper states that dioxin DCDD may have large public health implications due to its prevalence in our food and environment.

DCDD is one of the hundreds of kinds of dioxin - (TCDD is the worst, but DCDD may be equi-potent):

http://group.bmj.com/docs/pdf/8_3_s10.pdf
"2,4-D is contaminated with an unmonitored form of dioxin, 2,7-dichlorodibenzo-p-dioxin (2,7-DCDD)...There is very little research on this form of dioxin, but in 1986 2,7-DCDD was found to be "equipotent" to the very toxic 2,3,7,8-TCDD in a test of immunosuppression. Given the wide use of herbicides that are contaminated with 2,7-DCDD there may be large public health implications of this contamination of our food and environment."
The BLM needs to do an aggregate risk assessment considering exposures to humans, animals, water, drinking water, plants from COMBINED SOURCES in the area. BLM should do Drinking Water Level of Concern (DWLOC) testing and use the Forward Calculation Approach to include in an EIS when planning to use 2,4-D.

According to the Environmental Protection Agency (EPA) 2,4D:

Exposure to 2,4-D has been reported to result in blood, liver, and kidney toxicity (1, 2, 4). Chronic oral exposure in experimental animals have resulted in adverse effects on the eye, thyroid, kidney, adrenals, and ovaries/testes (1). Experimental animal studies have demonstrated delayed neurobehavioral development and changes in neurotransmitter concentrations in offspring exposed during pregnancy or lactation (5-9).

Low concentrations of 2,4-D have been found in groundwater in some states. Agricultural run-off containing 2,4-D may contaminate groundwater in some areas.

Experimental animal studies of chronic oral exposure have reported adverse effects on the eye, thyroid, kidney, adrenals, adrenals, and ovaries/testes (1). In addition, some experimental animal studies have reported teratogenic effects (birth defects) at high doses, including increased fetal death, urinary tract malformation, and extra ribs (15, 16). When adult female experimental animals were exposed to 2,4-D during their pregnancy and lactation periods, their exposed offspring exhibited neurological effects, including delayed neurobehavioral development (5) and changes in several neurotransmitter levels or binding activities (6-9, 17) and ganglioside levels (18, 19) in the brain. Delayed neurobehavioral development was manifested as delays in acquisition of certain motor skills such as the righting reflex (5).

Table C-18
Hazardous Materials

2. Because this area is the only priority-listed Mercury Superfund site in Nevada, the potential for health risks to residents and visitors from mercury contamination of old mill sites and tailing piles is significant. These health risks are still under investigation and evaluation by NDEP and EPA. Most of the contamination is from 1800s mining processing mills that used high-concentrations of arsenic, mercury, and lead. It is estimated that during the years they processed gold and silver in the subject areas, over 7,500 tons of mercury accumulated in the soils.
In the past, before the Lucerne and Billy the Kidd mines became patented, BLM was requiring an EIS from Oliver Hills in 1992. Prior to that Houston Oil and Minerals was denied a permit for a heap-leach operation in American Flat. Comstock Mining Incorporated (CMI) has, cleverly avoided any level of an EIS and even withdrew a ROW application because it would have led an environmental analysis. NDEP granted permits without a hint of concern about mining in the only NPL Superfund site in Nevada. Early on when questioned about this NDEP's response was, well, that area was stepped on before. EPA has, reluctantly, finally become involved. There are serious hazardous materials in this area that have been grossly mismanaged. BLM has, so far, been the only agency to take these issues seriously, it would be a mistake to turn over management of these sensitive lands to political processes that will not protect them. To further clarify some of the environmental issues we have cut and pasted one of the last letters we sent to EPA concerning the environmental hazards.
We would like to comment on the RMP and EIS that was published in the Federal Register on 2/24/2012. We live, work, own property and have businesses in the Virginia City Historic Landmark. This Landmark designation was originally intended to protect our historic district from surface mining. It, unfortunately, has little regulatory authority, although, it is administered by the US Park Service. This area roughly coincides with the Carson River Mercury Superfund Site (CRMS); know to contain 15 million pounds of missing mercury as well as unquantified amounts of lead and arsenic, used in historic milling processes. We strongly urge that any public lands in the CRMS and the Virginia City Historic Landmark be kept under BLM management. Neither the State of Nevada or Storey County have shown an ability to be stewards of this historic and environmentally contaminated area.

ISSUE 15: SPECIAL DESIGNATIONS

Table C-19
Special Designations

Area of Critical Environmental Concern
4. Areas of Critical Environmental Concern Areas of Critical Environmental Concern ("ACECs") are areas recognized as needing special management attention to protect and prevent irreparable damage to important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards. All current and existing ACECs should be retained, and the compatibility of current uses evaluated against protecting the integrity of the ACEC and the resources intended to be protected.
Areas of Critical Environmental Concern (ACEC) NDOW would like to participate in the delineation of ACECs and other areas that warrant special management considerations that are important for the conservation of wildlife species. Currently, we are evaluating wildlife and their habitat for ACEC and special management considerations. NDOW would like to offer our current wildlife datasets in support of designating ACEC's and other areas that warrant special management considerations.

Table C-19
Special Designations

Lands and Realty

Sensitive lands and resources should be retained in federal ownership. Sensitive lands and resources that would benefit the public should be purchased from willing sellers as the opportunity arises.

Acquisition of inholdings within existing Wilderness Study Areas or future wilderness areas or ACECs and other special areas should be given a high priority when opportunities with willing sellers occur. When these lands are acquired, they should be managed in the same manner as the adjacent public lands.

Table C-19
Special Designations

- Areas Identified as "Important Bird Areas" ("IBA")

Important Bird Areas, or IBAs, are sites that have been identified under the auspicious of the Audubon Society that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. IBAs may be a few acres or thousands of acres, but usually they are discrete sites that stand out from the surrounding landscape.

To qualify as an Important Bird Area, sites must satisfy at least one of the following criteria. The site must support:
o Species of conservation concern (e.g. threatened and endangered species)
o Restricted-ranges species (species vulnerable because they are not widely distributed)
o Species that are vulnerable because their populations are concentrated in one general habitat type or biome
o Species, or groups of similar species (such as waterfowl or shorebirds), that are vulnerable because they occur at high densities due to their congregatory behavior

Identification of a site as an IBA indicates its unique importance for birds. The IBA identification process provides a data-driven means for cataloging the most important sites for birds throughout the country and the world. The use of a hierarchical classification system further helps to establish priorities for conservation efforts.3

On the CCDS there are at least five IBAs that have been identified and recognized as important at the state level:
o Lahontan Valley Wetlands IBA
o Carson River Delta IBA
o Swan Lake IBA
o Walker Lake IBA
o Mount Grant IBA

For a detailed description of the sites, their valued and unique features and the factors threatening them, refer to the Audubon website at: http://iba.audubon.org/iba/siteSearch.do .
Many land uses may be compatible with recognition of an ACEC designed to protect the vulnerable features of a particular IBA, and the primary focus should be on maintaining the integrity and function of the area.

All ACECs should have surface occupancy and mineral rights withdrawn, and federal water rights protected to ensure their integrity and site characteristics.

3 For further information, see: http://web4.audubon.org/bird/iba/iba_intro.html

Table C-19
Special Designations

We also propose that you consider establishing new ACECs in the following areas:
-All areas identified as Essential or Important for the Sage Grouse
The Nevada Department of Wildlife along with other state and federal agencies has produced a baseline map showing habitat considered to be "essential" or "important" for the survival and viability of sage grouse populations in Nevada. These designations are also referred to as Category 1 and Category 2, respectively.1 Scoping map 5.1, shows the location of these areas within the Carson City District ("CCD"). While the purpose of this mapping exercise is not for use at the project level due to the scale involved, it most certainly is applicable at the level of a RMP revision.

1 For details and a description, go to: http://ndow.org/wild/conservation/sg/

No Grazing Alternative
BLM must fully analyze environmental effects of the No Grazing Alternative. This analysis is essential to set a solid comparative effects baseline and fully understand the significant ecological toll of any continued grazing use. Yet we fear that BLM is highly unlikely to adopt this across the entire landscape due to entrenched agency mindsets. It must be adopted in ACEC areas. We have proposed ACECs in association with the sagegrouse EIS, and request that you also consider those here. We request that all sage-grouse ACEC proposals submitted for that process be carried forward in this RMP - in case that process gets delayed or otherwise goes astray. Grazing permit retirement must be undertaken, and the Land Use Plan must achieve this. Permit retirement is necessary under all alternatives.

ACECs: The Sierra Club strongly supports the designation of ACECs or other wildlife management areas for all core habitat of the Greater Sage Grouse in the CCD. Biologists from the Nevada Department of Wildlife and the BLM are currently mapping these core areas. Other critical wildlife areas should also be evaluated for ACECs, including Important Bird Areas in the CCD (see Lahontan Audubon website for IBA descriptions: http://www.nevadaaudubon.org/bookstore.html#iba).

ACEC Proposal: Bi--State PMU's ACEC Proposal

BLM must designate ACECs that protect occupied sage--grouse habitats across the landscape that are necessary for sage--grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term.

In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.

FLPMA directs the secretary of the Interior to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values ...giving priority to ACECs..."

ACECs are to be designated in areas "where special management attention is needed to protect and prevent irreparable damage to important historic, cultural and scenic values; fish, wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards." (43 USC § 1702(a) 43 CFR 1601.0--5a).

Table C-19
Special Designations

To be considered as a potential ACEC and analyzed in resource management plan alternatives, an area must meet the criteria of relevance and importance, as established and defined in 43 CFR 1610.7--2

An area meets relevance criteria if it contains one or more of the following:

- A significant historic, cultural, or scenic value (including but not limited to rare or sensitive archeological resources and religious or cultural resources important to native Americans).
- A fish and wildlife resource (including but not limited to habitat for endangered, sensitive, or threatened species, or habitat essential for maintaining species diversity).
- A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features).
- Natural hazards (including but not limited to areas of avalanche, dangerous flooding, landslides, unstable soils, seismic activity, or dangerous cliffs). A hazard caused by human action may meet the relevance criteria if it is determined through the RMP process that it has become part of a natural process.

2. The SHPO suggests that the certain sensitive areas, such as Grimes Point and Sand Mountain should be considered for elevated protection such as an Area of Critical Environmental Concern for their significant cultural and environmental values.

Sage--grouse ACECs: Protect the complex of seasonal habitats required by sage--grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage--grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats.

Relevant Values

The Proposed ACEC meets the criteria of having Relevant values.

Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage--grouse.

Table C-19
Special Designations

Areas Identified as Nevada Highest Priority Conservation Sites
In 2006, the State of Nevada Natural Heritage Program published its list of "Highest Priority Conservation Sites ("Scorecard").2 Through this process, the State identified its highest priorities for the conservation of biological diversity within its borders. Sites are re-evaluated on a periodic basis and individual sites may be added or dropped. All sites are included as highest priorities because each contains one or more critically imperiled species - that is, these are places where a single event from threatening or destructive forces may cause serious population loss or irretrievable degradation of habitat, possibly leading to extirpation or extinction.

The CCD contains several of these sites and the BLM should consult the above referenced document and consult more closely with the Nevada State Heritage Program on precise locations and boundaries. Some such areas include:
o Sand Mountain
o Cain Springs
o Coyote Springs
o Warm Springs Valley
o Panther/Sun Valley
o Churchill Narrows, and possibly others.

2 Nevada Natural Heritage Program. 2006. Scorecard 2006: Highest Priority Conservation Sites. Carson City, Nevada. Available at: http://heritage.nv.gov/reports/scor2006.pdf .

The value, resource, system, process, or hazard described in the relevance section must have substantial significance and values to meet the importance criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:

- Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource.
- Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change.
- Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.
- Has qualities that warrant highlighting, or poses a threat to human life or safety.

Important Values
The Proposed ACEC meets the criteria of having important values.

The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource.

The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change.

Table C-19
Special Designations

Scoping Handout - 4.1 Areas of Critical Environmental Concern

I propose that all legal HA Wild Horse and Burro range land be designated as Areas of Critical Environmental Concern and be managed principally for wild horses and burros as per the 1971 Congressional Act and for BLM to utilize their discretion under 43 C.F.R. 4710.5(a) to close livestock grazing in the Has and/or or designate this area to be managed principally for wild horse herds under 43 C.F.R. 4710.3-2. Due to past management practices of the Has Wild Horses and Burros are now in grave jeopardy of losing their genetic viability as well as their designated legal land. This can be largely rectified by BLM following the law and providing these species their designated and legal land as a principle resource. This can be done even as the land is used within a multiple use policy – but the BLM must make it's decisions on proven scientific research and not on politically driven pressure from financial interests such as mining, trophy hunting, livestock and energy corporations. These special and legal management objectives must be immediately and continually put into effect in order to protect these special and unique resources.

National Historic Trails and Scenic Byways

High potential sites and segments, which typically contribute to the National Register eligibility of the trails, are identified in the Comprehensive Management Plan produced by the National Park Service in 1999. High potential sites that may occur within the Carson City District include:

- The Fernley Ruts
- Parting of the Truckee and Carson Routes
- The Humboldt Sink
- Humboldt Bar
- Cold Springs Station
- Sand Springs Station
- Edwards Creek Station
- Fort Churchill
- Mormon Station

According to the National Trails System Act, high potential sites are those historic sites related to the route, or sites in close proximity thereto, which provide opportunity to interpret the historic significance of the trail during the period of its major use. Criteria for consideration as high potential sites include historic significance, presence of visible historic remnants, scenic quality, and relative freedom from intrusion. High potential route segments, as defined by the Act, are those segments of a trail which would afford a high quality recreation experience in a portion of the route having greater than average scenic values or affording an opportunity to vicariously share the experience of the original users of a historic route.

High potential segments that may occur within the district include:

- Genoa to Union House
- Humboldt Sink to Dayton
- Mickey Canyon

Special management areas excluding ACECs and SRMAs (e.g., State Management Areas, WSR, WSA, Wilderness, National trails and byways, etc.0

Table C-19
Special Designations

Special Designations Land with Wilderness Character: The Carson City District has some beautiful, rugged backcountry. Many of the lands with wilderness character were identified long ago as wilderness study areas. We believe that this inventory was a good one but that there are some additional lands that also may have high-value wilderness character: the Virginia Range, Petersen Mountain, the PahRah Range, Rawe and Lyon Peaks and the Wassuks. We feel that these areas should be looked at more carefully during the BLM's RMP process as potentially having lands with wilderness character. We would like to work in partnership with the Carson City BLM to help collect data using the guidance in your new manuals. • Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process (BLM Manual section 6320) and • Conducting Wilderness Characteristics Inventory on BLM Lands (BLM Manual section 6310)
During the summer and fall of 2012, we hope to work with your office as we get into the field to gather data on lands with wilderness character. We will be providing detailed maps, photos and descriptions of wilderness values, as well as other documentation described in BLM's Manual 6310. We would welcome meetings and field trips with any of the Carson City BLM staff that might be interested in reviewing these areas with wilderness character.
3. Over 2,000 persons live in the Comstock Historic District (includes Gold Hill, Virginia City, and Silver City), which has long been designated as having Historic Landmark status by the National Park Service. The current Landmark status is already threatened because of mining activities in the historic mining corridor between Gold Hill and Silver City. Loss of Landmark status would negatively impact tourism to the area, and could impact V&T Railroad operations, as well.
Lands and Realty Sensitive lands and resources should be retained in federal ownership. Sensitive lands and resources that would benefit the public should be purchased from willing sellers as the opportunity arises. Acquisition of inholdings within existing Wilderness Study Areas or future wilderness areas or ACECs and other special areas should be given a high priority when opportunities with willing sellers occur. When these lands are acquired, they should be managed in the same manner as the adjacent public lands.
During the summer and fall of 2012, we hope to work with your office as we get into the field to gather data on lands with wilderness character. We will be providing detailed maps, photos and descriptions of wilderness values, as well as other documentation described in BLM's Manual 6310. We would welcome meetings and field trips with any of the Carson City BLM staff that might be interested in reviewing these areas with wilderness character.
It's not that we look down on the services of mining industry or miners, it is just not appropriate in a Superfund site where airborne mercury could be carried on the wind, caused by the ever-present dust of mining and mining exploration. And it's not appropriate in one of America's largest historic districts, and certainly not in a historic town with National Landmark status. The Comstock and surrounding BLM lands should be off limits to any disturbance that is damaging to our national reputation, that does not fit with our historic character and mission, and that poses serious risks to our health.

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Special Designations

As off-road vehicle user groups, sportsmen, renewable energy companies, etc. provide you with data on resources and recreation opportunities that are important to them, we too want to help provide detailed, reliable data for your consideration in this RMP regarding areas with wilderness character. Certainly FLPMA Section 201 requires that the BLM keep a current inventory of public lands and their resources

Sec. 201 (a) The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values.

Special Designations
Land with Wilderness Character: The Carson City District has some beautiful, rugged backcountry. Many of the lands with wilderness character were identified long ago as wilderness study areas. We believe that this inventory was a good one but that there are some additional lands that also may have high-value wilderness character: the Virginia Range, Petersen Mountain, the PahRah Range, Rawe and Lyon Peaks and the Wassuks. We feel that these areas should be looked at more carefully during the BLM's RMP process as potentially having lands with wilderness character. We would like to work in partnership with the Carson City BLM to help collect data using the guidance in your new manuals.

• Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process (BLM Manual section 6320) and
• Conducting Wilderness Characteristics Inventory on BLM Lands (BLM Manual section 6310)

We specifically request that any future renewable energy development within the CCD address the following concerns:
o Be consistent with the direction and intent of the Nevada Energy and Infrastructure Development Standards to Conserve Greater-Sage Grouse Populations and Their Habitats4
o Minimize the projects' ecological footprints; site renewable projects on previously disturbed lands;
o Avoid steep slopes in order to reduce erosion impacts;
o Avoid sensitive and rare natural communities;
o Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors;
o Require structures that discourage perching by raptors;
o Avoid fly-ways, especially for raptors;
o Avoid development of priority areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, regional conservation plans, recovery plan needs for threatened and endangered species, and Audubon IBAs;
o Avoid impacts to species of plants and animals listed under the state administrative code and the ESA;
o Avoid local, state, or federally protected lands;
o Minimize growth-inducing impacts;
o Be consistent with the conservation priorities of existing land management and conservation plans;
o Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities;
o Minimize cumulative impacts due to existing and planned development in the region;
o Actively restore native vegetation to the project footprints after the infrastructure has been constructed.

4 http://ndow.org/wild/conservation/sg/resources/nevada_energy_standards_for_sage-grouse_2010.pdf

Table C-19
Special Designations

Consideration of non-Wilderness Study Area lands with wilderness characteristics Many stakeholders believe that the BLM has unlawfully embedded an ongoing inventory and protection scheme for lands with wilderness characteristics in its land use planning guidance. Unlike the US Forest Service, where direction from Congress provides the direction to inventory for wilderness during the revision of each Land Use Plan, this is a very controversial idea for BLM lands. I respectfully ask the decision maker to carefully consider these comments when considering inventory for wilderness characteristics and potential designation of "LWC" or "Wild Lands" areas.
While the current regulations allow BLM to inventory for resources or values associated with wilderness, regulations do not allow for formulating management plans based on an inventory for a single resource value. All resources, including OHV and mountain bike recreation, must be included in your inventory for wilderness characteristics.
Eastgate area needs to have the wilderness study area released and open to motorized travel. Construction of trails that link the Middlegate and Eastgate areas.
Wild and Scenic Rivers: We support the evaluation of the Carson and Walker Rivers for designation and protection because of their outstanding remarkable values for recreation, fish and wildlife.
Wilderness: The Sierra Club urges the BLM to review its protection and management of the 7 WSAs in the CCD, especially from vehicular incursions, and strengthen its actions to protect these areas.
Special Designations Land with Wilderness Character: The Carson City District has some beautiful, rugged backcountry. Many of the lands with wilderness character were identified long ago as wilderness study areas. We believe that this inventory was a good one but that there are some additional lands that also may have high-value wilderness character: the Virginia Range, Petersen Mountain, the PahRah Range, Rawe and Lyon Peaks and the Wassuks. We feel that these areas should be looked at more carefully during the BLM's RMP process as potentially having lands with wilderness character. We would like to work in partnership with the Carson City BLM to help collect data using the guidance in your new manuals. • Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process (BLM Manual section 6320) and • Conducting Wilderness Characteristics Inventory on BLM Lands (BLM Manual section 6310)
The original Wilderness Inventory Handbook (The Wilderness Inventory Handbook formulated for the inventory pursuant to FLPMA § 603, hereafter referred to as the WIH) on page 5 notes that: "The wilderness inventory process requires full public involvement." This public involvement "is particularly important because the criteria in the wilderness inventory process call for judgments that can be highly subjective. In recognition of that fact, the BLM wilderness inventory process will be conducted as openly as possible with the broadest opportunity for input from all concerned, in order to arrive at a sound decision." (WIH page 5) This is precisely correct, and it's also precisely why any inventory for wilderness characteristics made pursuant to this planning effort using BLM's planning guidance has a high likelihood of being fatally flawed.

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Special Designations

I oppose the creation of the Burbank Canyon Wilderness Area. This area does not meet the qualification of Wilderness as defined in the Wilderness Act of 1964, not by any stretch of the imagination. In 1985 the BLM evaluated the Burbank Canyon Wilderness Study Area (WSA) and recommended to Congress that the entire WSA was not suitable for wilderness designation. In 1991 the BLM evaluated all WSAs in Nevada and again recommended to congress that the Burbank Canyon WSA was not suitable for wilderness designation. In 2001 the BLM issued a Consolidated Resource Management Plan and again recommended that the Burbank Canyon WSA was not suitable for wilderness designation. In 2008 the BLM issued a Draft Plan Amendment and once again recommended that the Burbank Canyon WSA was not suitable as a wilderness area Do not allow Douglas County's commissioners to push thru the Congressional Bill to designate Burbank Canyon as a "wilderness area" because YOU, the BLM, who are experts, say that it is NOT WILDERNESS.
The proposed trail system currently goes through areas identified by the BLM as potential disposal areas. CVTA recommends a minimum of 600 feet of trail corridor per each side of the trails to be retained in BLM management if future BLM land disposals were to occur. This protects the trails while preserving a wildlife and open space corridor. The following locations are where the proposed trail system and identified potential BLM disposal areas overlap: McTarnahan Hill Quad, Southeast quarter of section 26, T.14N, R. 20E McTarnahan Hill Quad, East half of section 35, T. 14N, R. 20E McTarnahan Hill Quad, East half of section 1, T. 13N, R. 20E Gardnerville Quad, Southwest quarter of section 28, T. 13N, R. 21E Mt. Siegel Quad, Southwest quarter of section 11, T. 12N, R. 21E.
AREA 1 (inside the dotted blue line): I honestly ride in this area around my home (the blue dot) at least once, and often twice, each week, year round except during periods of heavy snow. I rode in this area 12 times during last December alone. Yes, I am an avid rider, perhaps an addict. It's a quality of life thing for me. This area is already limited by the Sand Hills seasonal restriction, the Petersen Mountain Natural Area, the Fred's Mountain restrictions, Winnemucca Ranch locked gates (illegal?) blocking Black Canyon and access to the Virginia Range, the Hungry Valley Indian Reservation, and the Pyramid Reservation. Please keep all the existing roads and trails in this area open without restriction.
I have also attached a previously submitted ACEC proposal for the Bi-State sage grouse population.
We the American people are dam pissed off at the BLM,Forest Service,and every dam Government groups that are stealing our liberties,freedoms and rights to use our public ands,closing them off and caving into all these environmentalist wacko nut cases, your not saving a dam thing and you know it, it's always been about power,control,and of course money,and you will stop at nothing to do it,well we want it stopped and right now,we don't want or need anymore dam wilderness,or roadless place's in our country,we have way to many alread thank's to all of you lying leftist ass/holes.
To whom it may concern, I am interested in keeping as much BLM land available as possible. I've seen 'wilderness study' areas all over our land and it seems too restricting. My family rides four wheelers and we go to the Black Rock and Smoke Creek areas at least three times per year for camping, exploring, geocaching and photo shoots. It would be a real shame to limit access to any of our wilderness areas for the public to enjoy. Thanks for listening.
I am against any plans that will restrict access to BLM lands in Nevada.

Table C-19
Special Designations

I love wilderness and want it to be there for humans to enjoy for as long as we survive. However, when it comes to the "creation" of wilderness, enough is enough. We have already designated those places worthy of the name and maintaining it as such comes at a cost. To continue to shut down access to areas that already have and need roads is nonsensical. People need to get out of the cities and go into nature from time to time to recharge their batteries and be human. The human population will continue to grow and so will the need to use public land. Too many restrictions will result to over-use of popular areas because people can't get away from the crowds. Many of the National Parks and wilderness areas are already limiting numbers of visitors. Where are we going to go when it is all closed?
I know that in the past decade there has been a number of areas designated as Wilderness Areas in Nevada. At the beginning I could understand why it was being done even if I did not agree. I now believe this has gone too far and too much prime recreational areas have been taken away from the average person. Many people are not able to get back into the areas, not having horses or the health. Areas can be protected for the people without taking it away from the people.
During the summer and fall of 2012, we hope to work with your office as we get into the field to gather data on lands with wilderness character. We will be providing detailed maps, photos and descriptions of wilderness values, as well as other documentation described in BLM's Manual 6310. We would welcome meetings and field trips with any of the Carson City BLM staff that might be interested in reviewing these areas with wilderness character.
FLPMA Section 201 directs the Secretary to: "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern." It is clear from this language that all resource and other values on the public lands were to be part of a single inventory. When planning, there is no authorization for the agency to engage in inventories for a small segment (Wilderness) of only part of the spectrum of "resources and other values" (recreation). It is clear from the parenthetical phrase inserted in this section by Congress that Congress wanted the broadest range of resources and values considered and listed specifically two among the many which were to be included. When inventorying for "wilderness characteristics" in this RMP revision, the CCDO must also inventory for and disclose the full range of other resources, including mountain bike and motorized recreational activities. The analysis must disclose the impacts to those resources of any management that would "protect and enhance" the wilderness characteristics within each area. Also, an alternative should be developed that contains no new "non WSA lands with wilderness characteristics.
8. Wilderness Study Areas: need to be turned back to the public for multiple use after ten years. A study cannot go on for years,... Unless it is being used as an excuse by the government to shut an area down. This is not the intention of good management, but one of an out of control hypocritical agency.
The agency, when formulating inventory criteria during the original wilderness inventory, understood that, unlike inventories for plant and animal species, or oil and gas potential, qualities that make up "wilderness characteristics" are extremely subjective. The process is no less subjective and the task of doing a professional inventory no less difficult today. Full public and intergovernmental comment, review and involvement is every bit as necessary as they were in the first inventory. When developing the current (flawed) wilderness inventory guidance, the agency claimed that the only section of FLPMA that applies during any re-inventory for "wilderness character" was section 201, and therefore the important public involvement provisions do not apply to the planning guidance. This is clearly wrong. Numerous sections of FLPMA and NEPA require full public involvement and participation of State, Local and Tribal officials.

Table C-19
Special Designations

Congress gave very specific instructions to the BLM regarding Wilderness. Those instructions are contained in Section 603 of FLPMA. Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality, and then to begin an intensive inventory and analysis to determine which of the remaining lands should be recommended for inclusion into the National Wilderness Preservation System.

c; Comments regarding the potential utilization of the inventory criteria contained in BLM's current planning guidance The lack of public involvement in formulating the "land with wilderness characteristics" inventory criteria as well as lack of public involvement in the inventory itself creates a high likelihood of a flawed result.

A serious concern we have has to do with the lack of public involvement in the development of inventory criteria and decision making guidance currently imbedded in BLM's planning guidance for "wilderness characteristics." These are not merely semantic arguments. These concerns are directly related to the agency's Congressional mandates and obligations to the public when developing management plans.

b; Congress gave very specific instructions to the BLM regarding Wilderness

Those instructions are contained in Section 603 of FLPMA. Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality, and then to begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National Wilderness Preservation System.

That process has been completed. All stakeholders (including Wilderness Advocacy Groups) have exhausted the protest and appeal options. There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing wilderness inventory and review. Once the "603 Process" was completed, the agency is done with inventorying and managing for wilderness. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American People. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so is a tragic loss of management resources.

Semantic nuance?

Some BLM staff has suggested to BRC that our arguments presented in these comments represent a "semantic nuance" and are therefore not relevant. As we understand their argument, BRC's problem is not what BLM is proposing to do, but rather how BLM is proposing to do it.

BLM staff point out that BRC and its partners recognize the BLM's directives to consider values such as the appearance of naturalness, outstanding opportunities for primitive and unconfined recreation or solitude when formulating land use plans. That is true. We also recognize BLM's authority to determine desired outcomes (goals and objectives) and allowable (including restricted or prohibited) uses and actions anticipated to achieve desired outcomes. We also recognize the BLM's ability to designate lands in the Primitive Administrative setting (recreation class), where motorized and nonmotorized uses are prohibited.

But the agency should not dismiss our concerns as simply a semantic argument. We note that neither Congress nor the District Court in Utah was making a semantic argument. The reason this 'nuance' is so important was quite well expressed in BLM's original Wilderness Inventory Handbook (WIH), as well as the Wilderness Act's Organic Act Directives: "Inventory and management for Wilderness character is extremely subjective and controversial." (emphasis added)

Table C-19
Special Designations

a; Introduction
BRC and its partners have on numerous occasions addressed the manner in which BLM may appropriately discharge its FLPMA-prescribed review and management of lands recommended for inclusion in the National Wilderness Preservation System as well as FLPMA-prescribed direction for values commonly associated with Wilderness character (recreation and scenic values).

In presenting this information, we specifically note and incorporate by reference the pleadings and decision(s) in the long-running State of Utah v. Norton, litigation. In particular, we note the District of Utah Court's summary, contained in its September 2006, opinion, which states:
It makes no sense that the same Congress that jealously recognized its sole authority to declare wilderness and that set up two major laws (the Wilderness Act and FLPMA) to accomplish a properly considered exercise of that authority, would have created within one general section (section 202) of FLPMA an open-ended authority on the part of the executive branch of government to create WSAs which, once created, result in de facto wilderness. The Wilderness Act's process clearly ended in ten years, and FLPMA's wilderness designation provision, including those relating to the creation of WSAs, clearly ended in 1991... (State of Utah v. Norton, 2006 WL 2711798 at *29 (Sept. 20, 2006)) The agency appears to be arguing that its non WSA lands with wilderness character are not WSAs, and that FLPMA allows management for certain resources associated with wilderness characteristics (appearance of naturalness, outstanding opportunities for primitive and unconfined recreation or solitude). Thus, BLM would appear to argue, the "non WSA lands with wilderness character" designation is legal and consistent with FLPMA and other laws.

However, as the NOI and other scoping information clearly indicates, the purpose of this effort concerns the inventory, review and management of BLM lands in order to protect and enhance values associated with Wilderness, and ultimately for the potential inclusion in the National Wilderness Preservation System.

2. Comments on document 4.2 "Wilderness Characteristics and Wilderness Study Areas"
• Tell us about your knowledge of these areas or let us know of other areas that you feel should be considered for review of wilderness characteristics.

Many stakeholders across Western public lands states believe BLM has unlawfully embedded an ongoing inventory and protection scheme for lands with wilderness characteristics in its land use planning guidance. Unlike the US Forest Service, where direction from Congress provides the direction to inventory for wilderness during the revision of each Land Use Plan, this is a very controversial idea for BLM lands.

We respectfully ask the decision maker to carefully consider these comments when considering inventory for wilderness characteristics and potential designation of "LWC" or "Wild Lands" areas.

12. Comments regarding Issue 15 as defined on the issues webpage -Special Designations
We'll reference our quibble (comment 1 in this section) and comment that we are assuming Special Designations are addressed separately in the issue list in the NOI and in the Scoping Handout. Please see comments on the specific special designations in the sections below.

Table C-19
Special Designations

7. Comments regarding Issue 11 as identified on the issues webpage "Recreation and Visitor Services" ("Ditto" does not apply here as planning guidance mandates a 'range of alternatives' for SRMAs and because the CCDO is completing the implementation plan for route based recreational activities simultaneously.) A full range of alternatives should be developed for various SRMAs. Areas with a specific recreational niche can be more effectively managed and natural resources better protected with via a SRMA. All too often BLM planning seems to be an academic exercise, with little site specific implementation resulting from many land use plans. We encourage the CCDO to consider ways to provide direction in their Final Plan that will result in the development of necessary RAMP or other site specific planning within a reasonable and achievable time frame. (So that it would be written in the plan as an objective?) One Alternative should be developed that enhances recreational opportunity. (Please see comments in Section G)
I would like to see everything open unless specified closed and minimal "wilderness". I consider myself a "environmentalist" because I care about my OHV areas and I always clean up tons of trash out there and always will. Thanks for your consideration.
-Consideration of non-Wilderness Study Area lands with wilderness characteristics. Many stakeholders believe that the BLM has unlawfully embedded an ongoing inventory and protection scheme for lands with wilderness characteristics in its land use planning guidance. Unlike the US Forest Service, where direction from Congress provides the direction to inventory for wilderness during the revision of each Land Use Plan, this is a very controversial idea for BLM lands. I respectfully ask the decision maker to carefully consider these comments when considering inventory for wilderness characteristics and potential designation of "LWC" or "Wild Lands" areas.
While the current regulations allow BLM to inventory for resources or values associated with wilderness, regulations do not allow for formulating management plans based on an inventory for a single resource value. All resources, including OHV and mountain bike recreation, must be included in your inventory for wilderness characteristics.
The process was completed in 1991. All stakeholders (including Wilderness Advocacy Groups) have exhausted the protest and appeal options. Section 603 requires the BLM to manage WSAs in such a manner so as to not impair the suitability of such areas for preservation as Wilderness, subject to existing uses. There is no justification, no mandate in FLPMA and no process requirement for engaging in an on going wilderness inventory and review. Once the "603 Process" was completed, the agency isdone. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American People. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so is a tragic loss of management resources.

Table C-19
Special Designations

d; Congress specifically precludes the agency from inventorying and management for a single resource value It is unlawful to make decisions based upon an inventory for a single resource value. Making a decision to manage an area in a primitive recreation class because the area has been identified to have "wilderness character" is no less appropriate than making a decision to implement a full field development for oil and gas based solely on inventories for mineral and oil and gas resources. BRC acknowledges that the agency can inventory to its heart's delight. This includes inventorying for resources or values associated with wilderness. However, the mandate for resource inventory contained in FLPMA Section 201 does not allow for formulating management plans based on an inventory for a single resource value. All resources described in Section 201 must be included in your inventory for wilderness characteristics. Whenever making any land use planning decisions, the agency must comply with its congressional mandate to inventory for the "global" range of resources. The agency must not make decisions based on incomplete inventories or inventories based on a single resource value.

ISSUE 16: RENEWABLE RESOURCES

Table C-20
Renewable Resources

Energy Development - Renewable Energy
Just as solar energy farms in other BLM Areas are allowed to relocate the desert tortoise, new energy installations should be permitted to relocate the sage grouse, if it allows the new green energy to be built.
I think geothermal, solar & wind energy should be permitted ANYWHERE on BLM administered land.
5. Comments regarding "managing renewable energy development for geothermal, solar and wind" and "managing minerals" (all energy development)" Potential impacts to road, trails and areas used for recreation of renewable energy development should be disclosed in the analysis. All Alternatives should include direction to mitigate for any potential loss of recreational opportunity from future renewable energy development.
The haphazard nature of the BLM's right-of-way application process for renewable energy developments have led to a situation in which a comprehensive regional and landscape analysis of the impacts of these developments on species has not occurred. This RMP revision process must remedy this situation by analyzing and disclosing the present situation, as well as by identifying suitable and appropriate areas for further renewable energy development that would avoid or minimize impacts to species of concern and affected species. Comprehensive cumulative effects analysis must be a part of the decision making process in identifying areas suitable for renewable energy developments.

Table C-20
Renewable Resources

We specifically request that any future renewable energy development within the CCD address the following concerns:
o Be consistent with the direction and intent of the Nevada Energy and Infrastructure Development Standards to Conserve Greater-Sage Grouse Populations and Their Habitats4
o Minimize the projects' ecological footprints; site renewable projects on previously disturbed lands;
o Avoid steep slopes in order to reduce erosion impacts;
o Avoid sensitive and rare natural communities;
o Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors;
o Require structures that discourage perching by raptors;
o Avoid fly-ways, especially for raptors;
o Avoid development of priority areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, regional conservation plans, recovery plan needs for threatened and endangered species, and Audubon IBAs;
o Avoid impacts to species of plants and animals listed under the state administrative code and the ESA;
o Avoid local, state, or federally protected lands;
o Minimize growth-inducing impacts;
o Be consistent with the conservation priorities of existing land management and conservation plans;
o Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities;
o Minimize cumulative impacts due to existing and planned development in the region;
o Actively restore native vegetation to the project footprints after the infrastructure has been constructed.

4 http://ndow.org/wild/conservation/sg/resources/nevada_energy_standards_for_sage-grouse_2010.pdf

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We hope BLM will avoid geothermal, solar and wind energy development in areas and habitats where such development will not be compatible with the habitats for listed or candidate species (both federal and state), and BLM special status species.

Wind energy development impacts to birds, bats and other wildlife are well documented and could be severe if wind power development proceeds in the absence of careful planning to minimize collision impacts and habitat disturbance. Habitat impacts have received less publicity than collision impacts, although they could be as or more significant, particularly for imperiled species whose habitat is in prime wind energy production areas. Wind power facilities can directly impact habitats, via the footprint of turbines, roads, transmission infrastructure, and other support facilities.

Another concern related to renewable energy development, particularly solar and geothermal is the water needs for the development and operation of the site. Cooling for concentrated solar facilities, cleaning of photovoltaic mirrors, and water to support geothermal wells can consume thousands of acre feet every year. Being the driest state in the country, Nevada does not have an abundance of water for such uses. Lacking surface water resources, most of the water needed to support renewable energy projects is demanded from groundwater well. Many basins in Nevada are already over appropriated and pumping from them is already threatening seeps and springs and the species that depend upon them, such as rare desert fish and springsnails.

Of primary concern are the impacts of renewable energy projects on listed, candidate and other imperiled species.

The majority of the plans of development for solar projects to date have called for mass grading and/or vegetative clearance from the project site. Obviously this causes a horrific toll on the plants and animals residing on the site. Unfortunately, the same terrain characteristics favored by many species of concern are likewise the primary target area for solar and wind energy projects.

Table C-20
Renewable Resources

5. Renewable Energy Projects The development of renewable energy is a critical component of efforts to reduce carbon pollution and climate-warming gases, avoid the worst consequences of global warming, and to assist in meeting needed emission reductions. The Center strongly supports the development of renewable energy production, and the generation of electricity from solar power, in particular. However, like any project, proposed solar power projects should be thoughtfully planned to minimize impacts to the environment. In particular, renewable energy projects should avoid impacts to sensitive species and habitat, and should be sited in proximity to the areas of electricity end-use in order to reduce the need for extensive new transmission corridors and the efficiency loss associated with extended energy transmission. Only by maintaining the highest environmental standards with regard to local impacts, and effects on species and habitat, can renewable energy production be truly sustainable.
Geothermal and other Renewable Energy Resources: Geothermal leases should not be granted in areas of core priority Sage Grouse habitat, including leks and nesting areas. Wind energy proposals should be evaluated for potential impacts on Golden and Bald Eagles nests and breeding pair territories before applications are accepted in order to avoid locations with dense eagle populations. The mountain ranges around Virginia City such as the Flowery Range, Pine Nut Range and Virginia Range should be excluded from wind development to avoid adverse impacts to eagles.
We strongly disfavor the development of wind power facilities, or associated infrastructure, roads or transmission lines, in areas that will destroy, degrade or fragment important wildlife habitats. Roads and other linear disturbances present a particular challenge to wildlife in the form of habitat fragmentation. Continued habitat fragmentation forces wildlife to live on ever-shrinking islands of habitat, where it is more difficult for them to find food, water, shelter, mates, and protection from predators. Genetic problems such as inbreeding appear, and populations become more susceptible to catastrophic events such as wildfire. The resulting fragmented habitat inevitably leads to smaller populations of wildlife, and extirpation of populations or complete extinction of species becomes more likely. Renewable energy projects should be sited to utilize existing rights-of-way.
OHV use needs to be protected as green energy seems to take over the best OHV locations and once the green energy projects are done they are no longer able to be used in a multiple use concept

ISSUE 17: SOCIO-ECONOMICS

Table C-21
Socio-Economics

2. Economic Issues
A. Local Businesses
a. Businesses in Douglas County relying on mountain bikers, IHV enthusiasts or Equestrians:
i. Two bicycle shops.
ii. Three motorcycle shops focused on dirt bikes and ATVs.
iii. Two automotive repair shops servicing and building rock crawlers.
iv. Two ATV Tour outfitter.
v. One back country horseback outfitter.
vi. One manufacturer of custom built trailers for 4x4 enthusiasts.
vii. One manufacturer of dirt bike and ATV sprockets.
viii. One consulting business focused on attracting businesses that serve the outdoor recreation market.

b. Even in this down economic cycle these businesses employee approximately 0.5% of the Douglas County work force and comprises approximately 1% of the local economy.

c. Carson City and Reno have a similar mix of businesses proportional to their populations.
Ix. Al Lockett's Annual 4 day Off-Road Expo at Reno Events Center is a measure of regional interest in OHVs.

Marietta is the only range dedicated to wild burros in the West to our knowledge. It is a strikingly dramatic landscape and the burros here and elsewhere are a favorite with the public.

With this in mind, we recommend that the Marietta Wild Burro Range be managed for a genetically viable herd with a natural sex ratio. The BLM should appreciate and encourage the eco-tourism possibilities associated with this herd and its neighbor, the Montgomery Pass herd that is regularly visited by tourists both on foot and horseback. The boost to local small town economies in both California and Nevada should be considered in management decisions.

Some people misconceive recreational marksmen as being bent on making a mess and degrading natural features by using them as targets. I cannot deny that there are individuals who lack responsibility and do not show respect for the land that they make use of. However, as I am sure that many people who work in your district may attest, closing off areas to recreational shooting only hurts the people who were responsible users of that land in the first place. It is disappointing to hear about BLM closures to recreational shooting, because I know that the problems caused by the few "bad apples" in the community of recreational marksmen will not be stopped. Unfortunately, these individuals will continue to disregard the law and act irresponsibly despite any closures by your district, especially since the vast nature of your district makes enforcement of any closure a difficult task. The only people who will stop visiting your district's lands and contributing to the local economy will be responsible marksmen like myself.

Our family actively rides trails in the region and we whole heartedly support expanding capacity to include Sparks. It would definitely be an economic benefit for the community as riders spend more money in the areas they ride.

Table C-21
Socio-Economics

ENERGY (Wind, Solar, Geothermal) 2. ISSUE: The designated utility corridor along Heybourne Road that would carry the Blackhawk to Heybourne power line cuts through subdivisions that weren't on the books when the corridor was designed in the old RMP Although the Blackhawk to Heybourne power line has been put on hold at the request of NV Energy, the utility corridor that would house this power line and others still exists. When the corridor was designated, none of the subdivisions it passes through were built - most weren't on the books. These now exist. Whenever a line is constructed as it eventually will be in the corridor, it will lower property values. Existing small power lines in this corridor have caused prime building lots in Saratoga Springs to remain unsold- even during the development boom years of the early 2000's. Retaining this utility corridor which will allow construction of a line like the Blackhawk will create an OHV circuit through residential areas that doesn't currently exist, will impact a federally listed species habitat and may create health hazards.
We would like to express our support for the inclusion of more trails in the revision of the Resource Management Plan for the Carson City District. It is well documented that recreational trails provide significant social and economic benefits to an area such as ours. Providing mapped and signed trails assists in getting more people to experience the outdoors whether they are local residents or visiting here from out of state.
Despite the Washoe County Sheriffs Department saying that they can afford to go over to the range, I am not given a company car in which to indulge my hobbies. I have not been given gas to fuel my company car so that I can indulge my hobby and I will not in the future be given either to endure the trek down to Carson in order to utilize a range being run with a wide variety of skill levels and safety measures (Meaning I will not subject myself to being potentially getting shot when an idiot sweeps the range).
We should promote tourism of wild horses and burros, as the gambling industry continues to decline in Nevada.
Please consider during the course of your revising the Resource Management Plan for the Carson district the impact your decisions will have on hunting, fishing and ATV usage. The vast amount of BLM land available for these sports is of great importance to many Nevadans and has a direct impact on the local economies. Some western states like Montana and Wyoming either have or are proposing state constitutional amendments ensuring the everlasting constitutional right to hunt and fish in their states. Please ensure that Nevadans continue to be able to pursue their sports without undue limitations and restrictions. We are fortunate to have alot of public land that people can use, lets keep it that way and not become like Texas which has little or no public land people can use
There is also demand for a Motocross facility somewhat like the arrangement at Stead .Douglass county has expressed a desire to Manage such a track The City of Dayton has also expressed a desire for a track and already advertises out of state for OHV recreationists to "discover Dayton".Perhaps BLM can give The county a parcel off of Sunrise Pass rd. in an ammendment to the Douglas County Lands Bill a couple miles out from residential areas . The Pinenuts and other areas in the RMP are a major draw to the area and contribute to local jobs and our economy .Visitors buy gas, eat at our resturaunts ,sleep at our motels & hotels/casinos ,they buy parts & accessories, have repairs done & buy vehicles at our Motorsports dealers & independent shops.They have their trucks & RV's towed & repaired here .

Table C-21
Socio-Economics

B. Tourism d. In Douglas County, on any weekend you can find a couple dozen out-of-the-area vehicles with dirt bikes or quads staying at local motels, eating at local restaurants, buying gas at local gas stations. X. Douglas County Government is looking to increase tourism by attracting out of the area off road enthusiasts e. Numerous ATV tour companies based in northern Nevada. F. Virginia City Grand Prix fills Virginia City for a weekend xi. One of the top ten money making weekends for Virginia City . G. Dust Devils' Ride Reno 200 Dual Sport ride brings in several 100 out-of-the-area riders xii. Boomtown Casino was a sponsor until the event was recently moved to John Ascuaga's Nugget. Xiii. Cabela's in Verdi is a sponsor. H. Walker ATV Jamboree brings in several 100 out-of-the-area ATV riders filling the town of Walker. Xiv. Sponsored universally by Walker businesses. I. Walker River Resort caters to OHV enthusiasts. J. State of Nevada is courting OHV enthusiasts to help increase Nevada tourism. Xv. Elko County has determined that OHV enthusiasts contributes over $130,000,000 to the local economy xvi. Nevada State Commission on OHVs created a sub-committee to develop a statewide mapping program similar to Idaho's Trailblazers OHV Mapping system
Here's a very important point now so pay attention: people decide to look for homes here & buy property Which helps our resale values on homes & land . Oh yes and how about all the people that visit here to enjoy our vast public lands and decide to move their business here or open a new business here (both of which I have done) .
RESOURCE MANAGEMENT PLAN PROCESS While the RMP is concerned with 23 issues to be addressed by the RMP my comments will focus on Recreations and Travel Management. Recreation and travel on public lands is a vital part of the social and economic makeup of a Nevada lifestyle. From the Burning Man to the Virginia City Grand Prix the ability to recreate on public lands is key reason people and businesses move to northern Nevada.
I request that any Storey County BLM lands should be withdrawn from mineral entry regardless of future ownership. Much of Storey County lies within the Comstock Historic District, The Virginia City National Historic Landmark, and a Carson River mercury superfund site. The towns of Silver City, Gold Hill, American Flat and Virginia City are residential and business areas, getting much of their revenue from local commerce and the tourist trade. Recent mining in the last 20 or 30 years, has provided very little, if any revenue to this area. Instead, it has degraded the area through the destruction of the historic landscape through open pit mining and exploration.
4. We understand from talking with our U.S. Congressional delegation staffs that land deals are meant to grow politically from the grass-roots upward to legislators, and that the community should support the proposed plan. This is not the case in terms of Lyon and Storey County residents. Our Planning Commission and Board of Commissioners has for over a year now pursued opening our traditionally historic tourist town to open pit mining in spite of the overwhelming opposition of residents, as stated in public hearings, planning commission meetings, written comments, and yard signs.

Table C-21
Socio-Economics

3. Over 2,000 persons live in the Comstock Historic District (includes Gold Hill, Virginia City, and Silver City), which has long been designated as having Historic Landmark status by the National Park Service. The current Landmark status is already threatened because of mining activities in the historic mining corridor between Gold Hill and Silver City. Loss of Landmark status would negatively impact tourism to the area, and could impact V&T Railroad operations, as well.
1. We have a thriving town based on year round tourism, the Tahoe-Reno Industrial Park, and as a bedroom community for Carson and Reno. If mining were to control, lease, buy, or own mining claims in this area it would damage the tourism economy and lower property values of homeowners.
Recreation and Wild Horse Viewing As it is, most wildlife-tour visitors have to search long and hard to find any wild horses to view in the CCDO's HMAs. With the foals removed and virtually all the mares contracepted, there are few families, and especially, few precious "babies" frolicking on the range. Baby animals delight tourists. Adult horses, disfigured with huge freeze brands on their rumps, are not what the public is after. CCDO's herds need reproductive capacity in order to have foals for the public's wildhorse- and-burro viewing pleasure. BLM must ensure that the herds are self-sustaining. By making the HMAs principally for mustangs and increasing their presence, recreation will be enhanced. Build the herds, and the visitors will come.
Commercial interests -- cattle ranching, mineral and oil exploration, and the recreational vehicle industry -- have been given a much higher priority on our public lands than the rightful residents of our public lands, the horses and burros, which the BLM has been mandated to protect.
When revising its land use policies and establishing Appropriate Management Levels (AMLs) for wild horses and livestock grazing allotments, the BLM must consider social factors including prevailing public opinion. NEPA requires Federal agencies to consider environmental effects that include, among others, impacts on social, cultural, and economic resources, as well as natural resources. Thus BLM must consider both legal and social factors, in making land use decisions, such as setting and maintenance of AML and grazing allocations.
This was highlighted in a 1982 National Research Council report on the BLM's wild horse and burro program: Attitudes and values that influence and direct public priorities regarding the size, distribution, and condition of horse herds, as well as their accessibility to public viewing and study, must be an important factor in the determination of what constitutes excess numbers of animals in any area. . . [A]n otherwise satisfactory population level may be controversial or unacceptable if the strategy for achieving it is not appropriately responsive to public attitudes and values. . . . Biologically, the area may be able to support 500 cattle and 500 horses, and may be carrying them. But if the weight of public opinion calls for 1,000 horses, the area can be said in this context to have an excess of 500 cattle. For these reasons, the term excess has both biological and social components. In the above example, biological excess constitutes any number of animals, regardless of which class above 1,000. Social excess depends on management policies, legal issues, and prevailing public preference..."

Table C-21
Socio-Economics

Every time I see a feral horse, yes feral there are very few mustangs, I see approximately 10 dead deer standing in it's hoof prints. These animals are a menace to our lands and contribute almost zero to the local economy when compared to hunting. They need to be rounded up and disposed of not kept in pens costing us millions of dollars why we wait for habitat restoration. This animal is a herbivore and should be considered for a general hunting season.

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3. Comments on document 10.2 "minerals" and 10.3 "geothermal development"

The BLM wants your input...
• How should mineral development be managed to minimize resource conflicts?
• Are there public lands that should be withdrawn from mineral entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on mineral development? If so, what are they and where should they be applied?
• What are the potential social and economic effects associated with mineral development? How would planning decisions affect communities in the Carson City District? How can the BLM improve the management of geothermal resources?
• How should geothermal development be managed to minimize resource conflicts?
• Are there public lands that should be closed to geothermal entry because of conflicts with other public land uses?
• Should special conditions of approval be placed on geothermal development? If so, what are they and where should they be applied?

BRC supports reasonable development of our natural resources, including minerals, oil and gas and "renewables," such as geothermal, wind and solar. Generally, there is support among our members and supporters for development mineral resources and of oil and gas resources in the planning area. There is a high degree of confidence in BLM's ability to regulate this activity so that it is both economically feasible and environmentally sound.

The purpose of my comment is to stress the importance of the "Vegas to Reno" event held in August (August 17, 2012.) This event is very important to rural Nevada. Over 5,000 people, racers and pit crews, travel through rural Nevada; we go thru Las Vegas, Beatty, Goldfield, Tonopah, Mina, Hawthorne, Fallon, Dayton and Reno. We sale out these towns of gas, food, lodging, ice, and auto parts. Special Events are very important to any community and I know the people in the above mentioned communities count on the revenue from this event every year. The "Vegas to Reno" race began in 1996 and is the flagship of Best In The Desert. The race receives world wide coverage and the event is televised, again giving Nevada exposure. Nevada is the only state in the United States, that an event like this can be held and the BLM permitting this event is a real feather in their cap being able to permit an event of this magnitude. Thank you very much for allowing me to comment on the importance of "Vegas to Reno!"

Nevada is a tourist destination for the younger members of our family and they would to see wild horses IN The Wild, not in dry lots. Let's take care of our horses and make sure they have enough land to live on.

These are public lands which means I have just as much say in the use of the lands as do the ranchers. Most Americans want our wild horses and burros protected and allowed to live on our public lands. It is time that ranchers had to pay for land at a level that other Americans have to pay when they want to use land. If a reasonable fee were charged to ranchers, then they would not be so determined to use our public lands and they might find other land to use. In a market economy they should pay a market rate and if that is not affordable to them, then they should turn elsewhere for a sustainable living. So either we have a market economy or we don't. Everyone wants a market economy until it affects them. You must start doing your job and protect our wild horses and burros as is the law. Start representing the people and not the ranchers as greed should not be your motivater.

Table C-21
Socio-Economics

Any commercial usage of public lands should be charged a fair market rate for use of valuable resources with those funds applied toward implementation of the above recommendations in support of the legitimate primary responsibility to protect wild horses and burros.
We all have seen the numbers drop by a large percent in the last four years hurting the economy of Fallon and the revenue raised at the gates to take care of the public lands we all love.
My Wife and I reside in CA however in 2010 we purchased a vacation home in Dayton, NV solely due to the OHV opportunities in the area. Since purchasing our home we have created over $100,000 dollars of taxable revenue for Lyon County, furthermore numerous families visit our vacation home in Dayton on a regular basis and subsequently create thousands of dollars of tax revenue for both Lyon and Douglas County via food, gas and general supply purchases.
This last weekend the Virginia City Grand Prix took place primarily on BLM lands, this single weekend of OHV racing brings over $1,000,000 into the local economy.
Furthermore, the OHV opportunities within the CCFO's District support numerous businesses in the area including but not limited to: Motorcycle/ATV shops, 4 Wheel Drive shops, RV supply shops, Hotels, gasoline sales, food sales and subseqently these purchases support thousands of jobs.
We would like to also see area-wide EA's for areas previously utilized for racing activities. OHV activities provide for strong economic impacts in neighboring communities and we think this should be considered in land use plans and decision making processes. The City of Yerington is also working on a multi-use property acquisition to include OHV recreation and the adjacent areas should be designated as a SRMA
A significant percentage of our members live in rural areas of Nevada and California. The jobs associated with oil, gas and mineral development are highly valued. Indeed, many of our members make their living either directly involved in the oil and gas business, mining, power generation, or in related "service" businesses. Oil, gas and mineral development has important social and economic benefits at the national and state level as well. These benefits are reduced or eliminated when natural resource development is prohibited or severely restricted.
I encourage the BLM to grant permits to allow off-highway vehicle organized events in the Pine Nut Range. In the past there have there have been motorcycle "endurd" trail rides, one at the east end of Johnson Lane, and another based out of Dayton Fairgrounds. These "Wild Horse" and "Wild Pony" endurd trail rides are a great way to recreate responsibly on BLM designated roads and trails, and provide a legitimate use of this public land. An economic benefit is also derived by local businesses. Please allow these events to continue.
13. Comments regarding Issue 17 as identified on the issues webpage "Socio-Economics The analysis should include a complete and accurate disclosure of the socio-economic benefits of motorized recreation and how it differs across the alternatives.
My name is Tom Taflin and I write my comments because I moved here because of the amazing recreation opportunities we have around here. I have been recreating in Douglas County since 1996 while living in South Lake Tahoe. Everybody in South Lake Tahoe comes down here to enjoy the Pine Nuts. In addition to the Pine Nuts, I love to take my family and friends to Sand Mountain and the Black Rock Desert. I finally left Lake Tahoe to be closer to the Pine Nuts in 2006 and bought a home in the Johnson Lane area. I am a member of the Pine Nut Mountain Trail Association and the Toyota Landcruiser Association. OHV recreation is very important to me and my family and all my friends. OHV recreation is a very important asset to Douglas County.
-Permitted and Competitive events should be included in the RMP. Competitive and social events for mountain bikes, motorcycles, 4WDs, etc., are a valid use and the permit process should be streamlined and reasonable for both motorized and non-motorized users. These events bring monies to local economies.

Table C-21
Socio-Economics

5. Social/Economic Concerns: Nevada has the highest unemployment rate in the nation. Yet, when our rural communities need recreational tourism to help bolster their economies, the BLM is busy trying to shut down recreational areas for hunting, fishing, camping, etc. MULTIUSE has assisted in the survival of certain areas. The BLM should only assist in management IF REQUESTED BY COUNTRY GOVERNMENTS. No country can afford to waste its resources, whether loggin, mining or wildlife. California has lost 1000's of farm acreage due to a small fish that entered their irrigation system and the government came into shut those farms down. Where is the COMMON SENSE in federal agencies? Move the fish....
The last few years have been especially difficult for Nevadans; we need to look at opportunities to bring people to the area, and not limiting their outdoor experience. If major restrictions and limits are imposed during the new RMP, this will discourage OHV tourists from coming. These missing dollars will greatly hurt ALL businesses in the region. Please develop RMP amendments that reflect these issues and keep OHV use at the forefront and a positive experience for generations to come.
OHV enthusiasts are often families, comprised of all skill levels from the most novice rider, to the highly skilled expert. They all share the need for places to ride and enough space to ride to keep them coming back for years to come. One of the main reasons they visit our area is the drastic reduction and elimination of OHV routs in other locations. As an example 70% of previously open OHV routes have been closed in the Eldorado National Forest, and over 800 miles of existing OHV routes have scheduled for closure in the Bridgeport Ranger District. Any proposed changes in the Carson District RMP that limit or impact OHV use will discourage visitors and locals from enjoying our beautiful area. A reduction in dollars spent on OHV recreation will negatively impacting my sales which may lead to lay-offs for my employees. This would be devastating to their livelihood and families financial security. It would also cause significant harm to Nevada's fragile economy.
I can tell you that 40% of our total company sales are attributed to local dirt bike riders and visitors to the Carson City District. I imagine this is true for other motorsports businesses in the region. The economic impacts of your decisions should be accurately disclosed in your "socio-economic analysis."
My concern in regards to your recent RMP scoping period is the socioeconomic impact on my business and its employees. I have not seen any comments or hard data in regards to the possible impact on local business that could be affected by a new RMP. A low estimate of OHV related businesses in the Reno/Carson/Minden area is in excess of 50. This translates into 100's of jobs and families dependent on OHV dollars. There needs to be data collected to determine the socioeconomic effects on these businesses.
Amenities like toilets ,loading ramps ,dry camping & developed camping areas should be built . A system of routes that connect the individual "special recreation areas" of the Pine nuts ,Wilson Canyon ,Smith Valley,Desert Creek,Middlegate,Sand Mountain ,Moonrocks ,Fort Sage ,Black Rock,Nightengale that would inter connect them to encourage travel throughout the state.
The analysis must determine logical significance criteria for socio-economic and recreational opportunity impacts. Indicators such as miles of routes available for motorized use are useful, but others are needed for adequate analysis, such as number of loops, diversity of modality, number of existing campsites closed, level of difficulty, etc. The analysis should accurately describe existing recreation opportunities available on adjacent lands. Recreational users, like wildlife, often cross jurisdictional boundaries when pursuing their preferred activities. Information should also be provided on any ongoing land management planning on adjacent lands. Such information is necessary to compare and contrast the impacts of each alternative as well how the alternatives differ from the current condition.

ISSUE 18: ENVIRONMENTAL JUSTICE

No comments.

ISSUE 19: SUSTAINABLE DEVELOPMENT

No Comments

ISSUE 20: COMPREHENSIVE TRAVEL AND TRANSPORTATION MANAGEMENT

Table C-22
Comprehensive Travel and Transportation Management

7-b. ISSUE: The proposed Conservation Measures fail to address the topic of patch size in relation to sage grouse habitat. Habitat patch size can be critical for the survival of species that are affected by this phenomenon. OHV trails, two-track roads, ROW's and other structures that chop contiguous vegetation types (habitat) into small pieces must be evaluated with respect to the minimum size of a particular habitat needed by sage grouse to complete their life cycle. The general section of the proposed Conservation Measures hints at patch size, but doesn't really discuss the concept. If patch size isn't an issue, it should be stated in the Conservation Measures. Disregarding patch size can cause the decline or loss of a wildlife population as surely as outright destruction. If patch size science for sage grouse is unknown, the agency can't just say "Oh well."
7) There are plenty of trails, roads, and single tracks throughout the Pine Nuts of which none need to be closed. 4 Wheelers, ATV's, motorcycles, and mountain bikers need to stay on these routes and enjoy them and refrain from any off trail use. Horse riders and hikers should have full use of the BLM Pine Nuts and not be limited to trails. Postings at staging areas?
5) The staging/camping area just north of the dump on Pine Nut Road needs to be dedicated to the new and learning riders of ATV's, motorcycles, bicycles only. It is a great place for the younger kids to learn and has a track setup to ride on. This staging area also needs a toilet and unloading dock along with a post board. Again, I will offer my services to get this done.
4) New OHV staging area somewhere between/end of Stephanie and Johnson roads with toilet, an ATV/bike off-loading area, and a post board would be nice for the people at that end of the valley. The Single Tree staging area at Pine Nut Road past the dump needs a toilet and ATV/bike off-loading area. A basic pit toilet would work mainly for all the women that ride mountain bikes in this area. The ATV/bike off load can be made with railroad ties and fill so a truck can back up to it and roll their ATV/bike straight out. Many ATV/bike riders are killed just loading and unloading into their pickups using unsecured ramps. I have a backhoe and would donate my time to help out. This basin riding area needs to be limited to ATV's, motorcycles, mountain bikers, and hiking only (no jeeps, pickups, sand rails, etc.)
3) Respect the wishes of the Indian Tribe's gated fenced property on Stockyard Road and do not trespass. An Indian named Leroy lives there and respects the people that use the lands outside of his fence. There are roads around his property to enjoy the mountain. Staying off his tribal property keeps everyone happy. Signs would help to eliminate confrontations.

Table C-22
Comprehensive Travel and Transportation Management

One of the prime reasons I have for calling northern Nevada home is my intimate access to public lands. Further restrictions and micromanagement will not serve the public or preserve our lands. Further involvement in the use and care of public lands should be encouraged and nurtured in the public in general. Do not use BLM management of the public lands to drive a wedge between the people and their public lands. Educate and encourage people to use and enjoy this great county and we will all be stewards of the lands. Please let me know if you repair your glitches. I hope others trying to use these links were not frustrated as I was.
Access is not just for recreation We feel it is important to recognize that public access to these lands is not merely for recreational purposes alone, and restricting or confining public access to areas that suit only recreational purposes does not serve the public's interest. Since the area is already extensively covered by existing routes, these road resources contribute tremendous value to the area by making so much more of it accessible to people of all ages and diverse physical abilities -as long as they remain open to motorized vehicles and accessible under the "limited" designation to protect the resources.
This is assinine! This state is largley populated by hunters, fishers, and outdoor enthusiasts and without access to to the trails, shooting areas and other portions of the state it will restrict everyone to main routes depriving individuals of OUR right to enjoy this bountiful land. By doing this it will make the many beautiful features of this state dormant. This should be stopped immediatly!
While the current regulations allow BLM to inventory for resources or values associated with wilderness, regulations do not allow for formulating management plans based on an inventory for a single resource value. All resources, including OHV and mountain bike recreation, must be included in your inventory for wilderness characteristics.
BLM planning must recognize and address the need for the "Open" designation where appropriate. There are areas that have long been used for cross-country OHV activities, with no adverse environmental impacts, such as the Hungry Valley/Moon Rock "play areas." Some open areas are recognized for their high OHV popularity and should be kept available for those who value this type of recreation. Other examples of valued "open" designated areas are: dry lake beds, staging areas that provide recreationists to gather before and after traveling on OHV trails and "Tot Lots" where children and young adults can recreate with their friends in an area close to parental supervision. Some OHV events, such as trials competitions, require the "open" designation to be viable. Staging areas for competitive and other commercial events are another example. The Planning Team is cautioned not to segregate users who value the "open" designation into smaller and smaller areas. Crowding users who require the "open" areas can increase safety risks to the public as increasing numbers of OHV enthusiasts are compacted into ever-smaller areas.
IT IS VITAL THAT WE KEEP THE LANDS MANAGED BY THE CARSON CITY DISTRICT OPEN TO HUNTING, RECTIONAL SHOOTING AND OFF ROAD VEHICLE USE.
• Trails in the Ruhenstroth area were closed to protect paleontological resources

Table C-22
Comprehensive Travel and Transportation Management

Recreation 7-e. ISSUE: The proposed Conservation Measures fail to address impacts of individual OHV trails and subsequent two-track roads that impact sage grouse and sage grouse habitat. Discrete anthropogenic disturbance via highways and gravel roads has been identified as an important issue for sage grouse habitat in the Conservation Measures. Overall objectives talk about limiting roads and specific objectives talk to limiting road disturbance to 3%. The Conservation Measures overlook the impact of OHV trails left by individuals using public and USFS administered lands. Are these really to be categorized in the Measures as diffuse disturbances, along with livestock grazing? Individual user OHV trails mechanically damage sagebrush, disturb nesting and brooding, destroy riparian vegetation and drain wet areas through capillary action. In low-mid elevation areas, OHV trails lace and grid every drainage and ridgeline. Many of these trails become roads. Low elevation lands are a dirt trail / road web of fragmented, small polygon areas that can't function as sage grouse habitat. Nearly every low-mid elevation riparian area in Nevada potentially used by sage grouse for brooding is impacted by individual use OHV trails on BLM lands. Individual OHV trail / roads systems force the issue of discussion on patch size. The case can't be made that webs of OHV trails and two-track roads don't impact sage grouse and sage grouse habitat no matter which label, discrete or diffuse, these fall under. This issue must be addressed specifically for sage grouse.
While we support the special recreation management area concept, we don't want to be prohibited from applying for a special recreation permits in areas outside of an OHV area. Developing travel management plans in conjunction with the BLM will hopefully provide for a streamlined permitting process easing the process for both the agency and sponsoring club.
RECREATION / OHV (Hunting, Fishing, Hiking, Biking etc) 6. ISSUE: OHV track / trail mileage has increased exponentially, creating a web of trails, tracks and roads There has been an exponential increase in miles of OHV tracks / trails. In the lower west Pine Nut range, OHV tracks can be found on and in nearly every ridge and drainage, and on many hills. Many hills have parallel OHV trails on them, located just a few yards apart. The Sunrise Pass road now has a deep OHV trail paralleling it that didn't exist just a couple of years ago. Each OHV rider wants to ride in virgin country, blazing their own trail. The definition of "access" for many OHV users means cutting a new trail every time they're out. Every spring site in the Pine Nuts has at least an OHV trail to it which allows disturbance for deer fawn rearing and sage grouse brooding. Trails fragment many types of wildlife habitat which affects species diversity and help spread noxious weeds. Trails allow soil erosion to occur which eventually turn the trails into deep cuts that are impassible -creating a reason to make new OHV trails. During a recent attempt at an inventory of tracks / trails / roads in one area of the CCDO, the increase was so rapid, the inventory couldn't keep pace. It's nearly impossible to write effective regulations limiting OHV use to existing trails because new ones are created every day and are "existing" by nightfall. The problem has become especially bad since the USFS in California and part of Nevada closed its road system to OHV use except where posted open. The CCDO with specific areas like the Pine Nut Range is receiving unprecedented use from riders blocked from USFS lands
ACCESS / TRANSPORTATION 1. ISSUE: The exponential increase of miles of new OHV tracks have and are becoming trails which quickly become roads that cause resource damage There has been an exponential increase in the miles of OHV track roads across the CCDO, but especially near urban areas. It takes only a few passes of a small OHV to create a visible track. More OHV users follow these tracks and an established trail is created. Many of these trails are then driven by jeeps and other larger off road vehicles. During a recent attempt at an inventory of trails / roads in one area of the CCDO, the increase was so rapid, the inventory couldn't keep pace. Many game species reproductive sites have roads to and through these which allows disturbance. Roads bring predators that affect species like sage grouse, fragment many types of wildlife habitat to where species diversity is affected. Non-engineered roads spread noxious weeds, cause soil loss and can drain wet meadows. Numerous crossing, parallel tracks and roads and a gridded, web-like effect decrease the aesthetic experience of being on undeveloped public land areas.

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We would specifically like to support the inclusion of the Canoe Hill area trails into the plan revision. Although we do not condone the construction of social trails, there exists an opportunity here to work with a group of local riders to bring these trails up to recognized standards and include them into the system as an outdoor recreation opportunity right next to the City of Sparks.
Although our mission specifically involves non-motorized multi-use trails, due to the nature of the current use of many of the BLM areas in question, I am also compelled to support additional motorized trails. Mountain bikes and motorcycles can co-exist on trails as done in the Pine Nut Mountains area. The addition of motorized trails in appropriate areas reduces the congestion and poaching on trails closer to population centers that have more human powered use.
As the largest mountain bike organization in the region representing over 350 members, TAMBA would like to see the BLM consider the design and construction of mountain bike specific trails similar to what was done in the Sandy Ridge area of the Salem District in Oregon. The BLM staff there worked with the local mountain bike groups to create a riding area that is thoroughly enjoyed by locals and becoming a destination in itself.
CLOSING We appreciate the chance to provide our thoughts on what the RMP needs to consider. This letter represents the input of the Pine Nut Mountains Trails Association, an organization that speaks for its 80 members. We have stepped up to the plate by partnering with the Great Basin Institute and the BLM Carson District to establish a system of trail heads and backbone routes in the Pine Nut Mountains Management area. We believe this is a model that has been demonstrated to work.
F. SRMAs need to be viewed as "trailheads" for back county and adventure touring into the greater Nevada outback. As. These SRMAs want to be seen as keystones in a state wide recreation and travel management plan. At. These SRMAs want to tie into the plans the State and Counties of Nevada have to build local economies by increasing OHV tourism. Au. These areas should be defined to include as much area as possible to avoid the problems that come from high user density. G. Needs to partner with local groups that are willing to adopt the SRMAs.
E. SRMAs should be created in the: ao. Hungry Valley/Moon Rocks extending north to the Oregon border and west to the US 395 corridor and east along the Pyramid Highway and Black Rock Desert. Ap. Virginia City area north to I80, east to Alt US 95 and South to US 50. aq. Pine Nut Mountains north to US 50, east to Alt US 95 and south to the Sweetwater Mountains. Ar. Wilson Canyon xx. The area just north of the Walker River could provide opportunity for open riding area
Permitted and Competitive events should be planned for in the RMP. In anticipation of Special Recreation Permit requirements for organized recreation activities - as well as to streamline the permitting process for mountain bike events, rock-crawling events, ATV Jamborees and off highway motorcycle races - BRC suggests the CCDO consider developing an Alternative that would evaluate certain routes/areas for competitive and permitted events. It would provide a public benefit to all trail users, both motorized and non-motorized, to approve routes for permitted events in the programmatic travel planning process. We also believe this would benefit the agency by helping to reduce the future workload when processing permit applications.

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One aspect that I have not heard mentioned during this scoping period is the valve of "high skill" single track for the very experienced rider. Currently there are nearly 100+ miles of high skill single track in the Pine Nutt mountains, this single track should remain open as a draw to skilled/expert level riders. Those who possess expert level skill on a motorcycle are not content with riding easy, un-challenging routes. I volunteer now to work with the BLM to identify and maintain these routes. It is very important for the serious off-road rider to have numerous loop options of various mileage and difficulty for riding. Nobody wants to ride on roads or wide trails, and nobody wants to ride the same trail twice in a day. In other words, trails need to make a loop, not an out and back type of trail.
Scoping Handout- 3.1 Recreation and Travel Managemeny and Soping Handout- 3.3 Recreation and Transportation Management FAQs I propose that all motorized vehicles be banned from off-road travel within any legal Herd Area (HA) land. I personally have even seen OHV hunters driving off-road within legally designated Wild Horse and Burro areas in search of something to shoot (guns visable). This is despicable in both the ethics of hunting and in the concept of range health. I supply you here with a photo of a recent OHV event on the Twin Peaks HMA as an example of OHV damage being done.
I would like to see more special events able to be planned in the Pine Nuts. More areas for backcountry camping would be fantastic also. I understand issues with the sage grouse and our club will help in any way to help that species. When you guys need help with anything just let us know because we know you are understaffed.
While the current regulations allow BLM to inventory for resources or values associated with wilderness, regulations do not allow for formulating management plans based on an inventory for a single resource value. All resources, including OHV and mountain bike recreation, must be included in your inventory for wilderness characteristics.
-Where appropriate, the planning process should address the need for "Open" designations. Dry lake beds, Hungry Valley/Moon Rocks, are but a few examples.
-The BLM should continue to not only allow but promote responsible motorized access and recreation. The BLM should formulate a prorecreation alternative, not draft or present only plans with significant reductions to access.
5. Social/Economic Concerns: Nevada has the highest unemployment rate in the nation. Yet, when our rural communities need recreational tourism to help bolster their economies, the BLM is busy trying to shut down recreational areas for hunting, fishing, camping, etc. MULTIUSE has assisted in the survival of certain areas. The BLM should only assist in management IF REQUESTED BY COUNTRY GOVERNMENTS. No country can afford to waste its resources, whether loggin, mining or wildlife. California has lost 1000's of farm acreage due to a small fish that entered their irrigation system and the government came into shut those farms down. Where is the COMMON SENSE in federal agencies? Move the fish....
Due to what is now a FAULTY SYSTEM, the following has occurred: 1. Access / Transportation: Existing roads are being closed that were in use for years, such as the fiasco in northeastern Nevada. Leave existing roads open.
As part of this RMP revision, we would like the BLM to consider the following: Off-road desert racing has been a part of Nevada's heritage and we would like to see designated special recreation management areas for the Moon Rocks OHV area. Also an increase in this OHV boundary to include the Dog Skins mountains and south to the Sun Valley / Golden Valley areas.
There should be several unrestricted off-road play areas identified in the RMP. Areas that could be used for such could be areas of sand dunes that typically boarder dry lake beds. One example could be the Smoke Creek desert.

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We would also like to see the Pine Nut Mountains designated as an OHV park under a special -recreation management area as well.
In your RMP planning, areas of great benefit for the off-road community need to be defined and protected for future generations to come. Two areas that you have already identified are the Pine Nut Mountains and the Hungry Valley/Moonrocks areas. Both of these areas have an extensive trail system already contained in them, they need to remain open and accessible for all. All the routes that are currently available are valuable, and none should be slated for closure in these areas. Any route that is deemed to be inside a "sensitive" area can be moved. These routes should be looked at in a case by case basis, but overall both of these areas (Pine Nuts and Hungry Valley) should remain as designated OHV areas. Also, The local OHV community can and will be extremely helpful in adopting routes in the district, therefore I ask the BLM to actively work to establish positive relationship with the OHV community.
Presently, there is a need to develop trail based recreational resources within the Pah Rah Range and address the increasing user conflict. The official development of this trail system would contribute to goals established within plans published by the City of Sparks, Washoe County Regional Parks and Open Space, and State of Nevada with respect to establishing trails and promoting the preservation and use of open space. Further, these comments are congruent with BLM policy and procedure that prompts citizens to alert BLM of existing social trails and inform BLM about favorite places for recreation.
Prior to urban sprawl/expansion of the City of Sparks, these BLM lands were used in various ways (e.g., cattle grazing; equestrian; OHV usage, including 4X4s, motocross, ATVs; hunting and shooting; dumping; and non-motorized OHV usage, including hiking and mountain biking). However, due to an increase in population, the development of neighborhood communities as part of the expansion of the City of Sparks (e.g., Wingfield Springs), and establishment of the Golden Eagle Regional Park, access to the adjacent BLM lands has improved. As a result of improved access to these public lands, an increase in recreational activities by the general public, there is an overall increase in usage of these BLM lands. As such, land usage by the different user groups is now producing conflict due to competing activities (e.g., shooters vs. hikers). With the expansion of Sparks City limits and urbanization of bordering lands, historical usage of the land (i.e., hunting/shooting) in combination with present day usage (i.e., hiking, mountain biking, general exploration) creates safety issues. These comments concern a call for BLM to address the user conflict and safety issues that exists and is increasing (i.e., shooters vs. non shooters), identification of the lands for recreational purposes, and protect open space near urban development. Specifically, the intent of these comments is to prompt the BLM to consider these lands in the current RMP update as a recreation corridor.
The Canoe Hill Trail Association (CHTA) is an informal group of trail users that first approached the BLM in 2007 regarding an existing "social trail" that exists on approximately 1920 acres of BLM lands (T20N, R21E- Sections 19, 30, and 31) managed the by Carson District Office. These BLM lands are in the Southwest region of Pah Rah Mountain Range within the City of Sparks, Washoe County, Nevada. The Washoe Paiute Tribes have reservations in the general region and includes all or portions of the Pah Rah Range as part of their ancestral homelands. Individuals from these communities and tribes utilize outlying portions of the mountains for a wide variety of commercial, recreational, subsistence, cultural and religious activities.
The last few years have been especially difficult for Nevadans; we need to look at opportunities to bring people to the area, and not limiting their outdoor experience. If major restrictions and limits are imposed during the new RMP, this will discourage OHV tourists from coming. These missing dollars will greatly hurt ALL businesses in the region. Please develop RMP amendments that reflect these issues and keep OHV use at the forefront and a positive experience for generations to come.

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OHV enthusiasts are often families, comprised of all skill levels from the most novice rider, to the highly skilled expert. They all share the need for places to ride and enough space to ride to keep them coming back for years to come. One of the main reasons they visit our area is the drastic reduction and elimination of OHV routs in other locations. As an example 70% of previously open OHV routes have been closed in the Eldorado National Forest, and over 800 miles of existing OHV routes have scheduled for closure in the Bridgeport Ranger District. Any proposed changes in the Carson District RMP that limit or impact OHV use will discourage visitors and locals from enjoying our beautiful area. A reduction in dollars spent on OHV recreation will negatively impacting my sales which may lead to lay-offs for my employees. This would be devastating to their livelihood and families financial security. It would also cause significant harm to Nevada's fragile economy.
Amenities like toilets ,loading ramps ,dry camping & developed camping areas should be built . A system of routes that connect the individual "special recreation areas" of the Pine nuts ,Wilson Canyon ,Smith Valley, Desert Creek, Middlegate, Sand Mountain ,Moonrocks ,Fort Sage ,Black Rock, Nightengale that would inter connect them to encourage travel throughout the state.
As a member of Blue Ribbon Coalition ,the Pine Nut Mountains Trail Assoc. ,Save The public Trails ,CPA & HSMC I will tell you that we have needs for a wide variety of routes and terrain to continue to enjoy our most treasured and highly valued sport and lifestyle . Single track trails top my list by far. The majority of them should be narrow & challenging for the hardcore trail rider. Many of them should be moderately challenging for beginner to intermediate level riders .Sandwashes also make naturally occurring trails that suit everyone well. If we didn't want to be challenged we would stick to two track. 4X4 jeep roads & two track routes that ATV's 4X4's and side by side UTV's enjoy exploring the back country on are also of major importance . Each of the major use areas should have several "open" play areas for "hillclimbs" (we have horsepower hill at sand canyon road in the pine nuts for example) also the canyon and some of the low hills south of the staging area kiosk on Pinenut road that has a network of tight trails that would be best used as an open play area. I am sure the rock crawlers could use an open play area that contains the nescessary boulder piles to make some challenging runs for them.
We would like to also see area-wide EA's for areas previously utilized for racing activities. OHV activities provide for strong economic impacts in neighboring communities and we think this should be considered in land use plans and decision making processes. The City of Yerington is also working on a multi-use property acquisition to include OHV recreation and the adjacent areas should be designated as a SRMA
B. Designated uses needs to Include Motorized, Mountain Biking and Equestrian roads and trails. ag. Should not be seen as a single use Special Recreation Management Area. Needs to be multi use. Ah. Mountain Biking, Equestrian and Hiking trails can be used to build buffer zones. Ai. OHVs given through routes to take them through the buffer zones. Once beyond the buffer zone the road and trail network needs to provide a quality recreational experience to encourage OHV users to stay out of the buffer zones
Seasonal closures on the district should not be considered, expect possibly in areas of extreme impact. Any proposed seasonal closure to motorized use should be based on current weather conditions, not a blanket "date to date" policy.
These are public lands. Only the most serious needs should limit public access and public use, and this includes motorized travel. The average citizen simply cannot travel the length and breadth of public lands on foot or by horse. Try asking your neighbors how many of them know how to ride or how much it costs to own or rent a horse for such use! Motorized access of some form is the ONLY access the vast majority of the public have to these areas.

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D. Management plan needs to include the pre-authorization/approval to do mechanical maintenance of the trail system.
Al. Management plan also needs a process for replacing routes that from time to time may need to be retired so as to maintain a total mileage of trails.
Am. Needs to partner with local enthusiasts groups.
An. This should also include the pre-authorization/approval of holding special recreation events.
Xix. Needs to differentiate between impact of racing events and dual sport or poker runs. Most any open road or trail should be considered for holding dual sport rides/poker runs

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To Whom It May Concern,

Marinating accessible trials for OHV use is vital to the quality of life for many Nevadans. For me and my friends, it's a singular reason for coming to the Great Basin, We purchase vehicles here, supporting local businesses, and we always take precautions to minimize our impact on the areas we ride.

By and large, riders of dirt bikes and quads are very responsible users of our public lands, and sticking to established trails is a strong part of the ethic. Note that many of these trails are in GPS maps, and are often the only way to reach points of interest. Already, most sensitive areas are off limits.

Instead of additional blanket closures, we believe that BLM efforts would be better directed toward outreach and education on issues of fire prevention, noxious weeds, and "leave no trace" campaign; and of course, enforcement of existing regulations.

The names below are all users of public lands in Nevada and Northern California who urge you to keep these areas open to all. (57 names)

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9. There is a need to provide for commercial motorized tour operators. Yet another popular activity that is expected to grow, motorcycle and ATV tour operators provide a needed service and economic benefit to adjacent communities. Similar to our recommendations regarding permitted and competitive events, we strongly encourage the BLM to consider evaluating commercial activities, as much as possible, within the programmatic land use plan, thereby streamlining the permitting process and reducing staff workload.

The CHTA remains committed to continued work with the BLM to protect the existing social trail and add additional new trail. It is hoped that these comments are added to the current RMP update process. These comments call for BLM lands (T20North R21East, sections 19, 30, and 31) to be identified within the update as a recreation corridor and potentially identified in a future R & PP lease as a natural, desert park that consists of open space and a trail network.

Currently, an eight (8) mile "social trail" exists on T20North R21East, sections 19, 30, and 31, which is adjacent Golden Eagle Regional Park (GERP), to the southwest. The GERP is operated by the City of sparks on land that is leased from the BLM through an R & PP lease. At the south end of GERP, the Pah Rah Trailhead has been established, and is recognized as a Washoe County Regional Parks and Open Space Trailhead. The CHTA has been working with the BLM by proposing to expand the Pah Rah Trailhead by conducting improvements on and expansion of the existing social trail network.

We would like to express our support for the inclusion of more trails in the revision of the Resource Management Plan for the Carson City District. It is well documented that recreational trails provide significant social and economic benefits to an area such as ours. Providing mapped and signed trails assists in getting more people to experience the outdoors whether they are local residents or visiting here from out of state.

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Specifically, consider integrating hunting and recreational shooting opportunities in all federal agency plans for travel management, land management, analyses under the National Environmental Policy Act (NEPA), and related road closures and other access limitations; ensuring that hunting and recreational shooting opportunities are a priority." BLM Instruction Memorandum IM 2006-006, details the process of implementing E.O. 13443. and provides a link to the Order. The IM can be accessed on the web at: http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/20080/im_2008-006.html Consequently, the BLM should include areas that are applicable for development of supervised and unsupervised shooting areas and ranges and ensure that all areas are open for hunting access
I am submitting this form to support the inclusion of the trail system, proposed by the Canoe Hill Trail Association, into the RMP and that the Canoe Hill Trails be designated for recreational and public purposes.
The American Indian Religious Freedom Act, P.L. 95-341, 92 Stat.469 (Aug. 11, 1978) (AIRFA), codified at 42 U.S.C.§ 1 996, is a United States federal law and a joint resolution of Congress that was passed in 1978. It was enacted to protect and preserve the traditional religious rights and cultural practices of American Indians, Eskimos, Aleuts, and Native Hawaiians. There rights include, but are not limited to, access of sacred sites, freedom to worship through ceremonial and traditional rights and use and possession of objects considered sacred. The Act required policies of all government agencies to eliminate interference with the free exercise of Native religion, based on the First Amendment, and to accommodate access to and use of religious sites to the extent that the use is practicable and is not inconsistent with an agency's essential functions. The Act, recognized the "inherent right" of American citizens to religious freedom; admitted that in the past the US. government had not protected the religious freedom of American Indians; proclaimed the "indispensable and irreplaceable" role of religious "as an integral part of Indian life:" and called upon governmental agencies to "protect and preserve for American Indians the inherent right of freedom to believe, express, and exercise the traditional religions." The resolution referred specifically to Indians' access to sacred sites, the use of natural resources normally protected by conservation laws, and participation in traditional Indian ceremonies. The Act, AJRFA enacted at a high-water mark of federal concern of for American Indians, a time when U.S. policy-makers were recognizing the validity of Indian claims to land and sovereignty and were acknowledging the history of U.S. mistreatment of Indian Tribes. Progressives, who saw government as an instrument for assisting the disadvantaged, passed AIRFA as a corrective measure. The Native American Graves Protection an Repatriation Act, P.L. 601-101, was passed by the Congress in 1990. It requires the accurate identification, reintegration, and well documented transfer to affiliated descendants of all remains of Native American Ancestry, etc. In Great Basin, RMP planning area, thousands of artifacts, skeletal remains, and related objects are preserved; sacred ceremonial sites are within this area, etc.
n particular, future plans for the Sun Valley Rim Trail and Canoe Hill Trail System, which are greatly desired by the public, are very dependent on cooperative participation by BLM and should be included in the RMP. If these trail corridors could be addressed with the Environmental Assessment associated with the RMP, it would greatly assist Washoe County and our community partners on these projects. At minimum, if these important trail systems were included in the RMP for future accommodation, it would be greatly appreciated by our agency, our partners, and for future generations. We recommend that T20 R21 S19, 30, 31; T19 R21 S5, 6, 7, 8 be retained to accommodate the Canoe Hill Trail System or possible considered for R&PP designations. This is near a sensitive cultural area, but is in great need for managed recreation to reduce current user conflicts and on-going safety issues with congested area shooting and recreation participants.

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Iam petioning the BLM board by requesting that the existing rule be modified to allow competitive motorized events at SM Neveda Recreational Area.
Travel Management: Managing vehicular use of public lands and avoiding, minimizing and mitigating adverse impacts of motor vehicles is a critical element of the RMP. While the Sierra Club strongly supports access to public lands, it also is concerned about the harmful effects of off-road travel, especially on erosion, riparian area conditions, the spread of invasive weeds, and impacts on Sage Grouse and other wildlife. Sierra Club members are both vehicular and non-vehicular users of the public lands. We urge the BLM to follow its travel management process to develop road and trail maps in the CCD through a public process. These routes should avoid or minimize destruction and fragmentation of wildlife habitats. Redundant or unneeded roads should be closed. Seasonal restrictions should be imposed to lessen impacts on Sage Grouse leks. We especially support signing roads and trails open, as the previous attempts to sign roads "closed" has simply resulted in the destruction of closed signs. Areas to be closed or restricted include core priority habitat areas for Sage Grouse and all habitat for threatened, endangered and sensitive species (TES) in the CCD. Presently, roads and trails appear adequate for the CCD area, but this may change in the future with increased population, increased unacceptable impacts, and the need for increased protection of the habitat of TES species.
We have been in contact and had meetings with the CHTA members over the years and share their perseverance and commitment to more non-motorized trails in all of Northern Nevada. These trail opportunities are desired by the majority of Northern Nevada residents, add to the quality of life we enjoy, and can help the BLM manage and preserve the lands we enjoy.
Because OHV use is the largest use of public lands and provides the biggest economic impact on Nevada community's. I would like to see a large OHV open area set aside for OHV use . it needs to be over 40,000 acres and be able to be expanded.
The primary mechanism for the public to review the impact of proposed actions is the “route” map. It is important that the draft maps are detailed, accurate and consistently formatted between phases of the project.
Land Tenure In terms of lands and realty, which the BLM may ultimately dispose of, it is important to recognize roads, ways and trails that have long been used by the public and to which the public may likely have acquired a prescriptive right-of-way. We suggest that title documents include language to preserve such rights-of-ways, such as "subject to the rights of the public to utilize roads presently existing and to which the public has acquired a prior statutory right to use."
Access/Transportation Maintaining the current system of routes and access points is of paramount importance to the continued use of our public lands for recreational and economic purposes. The current system could be improved if additional 'single-track' routes were established.
I do not want any more restrictions on any type of public recreation, including those caused by wilderness. I want better access to our public lands.
Trail system -having a trail system would really improve the outdoor experience as you would know what is out there, where you can safely go and proceed, one way or two way traffic and how to get out if someone gets hurt. i. Citizens/businesses have created these over many years of use -give them an opportunity to maintain/improve/build trail systems. There are some really neat things going on in others states to model from.

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1. Suggestions for continued recreation use on BLM land: a. Camping needs to be free and permissible to camp in many open areas. b. Two track needs to be open and designated with a trail system c. Technical single track needs to be defined and open with a trail system, specifically for 2-wheel bikes (bicycle or motorcycle) d. Designated Trailheads there are many staging areas that are not defined and could really help educate and inform local and foreign use of trail systems
In addition, if OHV is to be allowed at all on any public land then it must limited to designated public lands where it must be monitored closely by BLM in order to decrease as much as possible any destruction of the land by these motorized activities. All vehicles on public land for any purpose must stay on designated roadways and these roadways regardless of need, be it recreation or commercial must be designed and kept at the least invasive level.
BLM cannot possibly say that this demolition of our public land is within their range health management. This is utter and complete destruction of the range. BLM cannot possible say that Wild Horses and Burros or any wildlife are causing destruction of the range when this damage is allowed and encouraged on our public land. All motorized OHV must be banned from all HA land. This approved OHV action is a deceptive and dishonest representation of range health management by the BLM. Any intelligent human can see that this kind of motorized OHV activity detrimentally effects the soil, the air, the water shed, the visual resources, and any fish or wildlife that have access to the area not only during the OHV activity but also after the activity ends. This must be stopped.
Conflicts in Urban Areas We recommend that BLM explore safe and effective methods to mitigate vehicle collisions with wild horses and burros rather than rounding up and removing them. Streiter-Lites have reduced nighttime deer/auto collisions by 78-90%. The cost is minimal at $10-15 thousand dollars per mile. This includes installation, labor, and parts, and is far cheaper than roundups and subsequent holding. This technology would pay for itself quickly as most collisions would be avoided. Coupled with proper signage along roads where collisions have occurred in the past, accidents could be eliminated in the future. This would have been far cheaper than the "nuisance" roundup of burros in the Bullfrog HMA earlier this year. Under the Federal Highway Administration's Highway Safety Improvement Programs 90% funding is available, another cost savings to BLM, particularly if local and state government agencies apply for this funding.
In addition, the Code of Federal Regulations (43 C.F.R. § 19.2(e)) establishes the following definition: "An improved road that is suitable for public travel by means of four wheeled, motorized vehicles intended primarily for highway use." IM 2006-173 ("Implementation of Roads and Trails Terminology Report"), which sets out and defines associated with transportation management, also includes a definition of a road as: "A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use." Therefore, it's incumbent upon BLM to exclude "user-created" routes from the inventory. To include these routes is to legitimize and "grandfather in" illegally created routes and/or routes which have not been improved or maintained by mechanical means to ensure regular use.

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BlueRibbon Coalition members use motorized and non-motorized means, including Off-Highway Vehicles (OHV), snowmobiles, equestrian, mountain bikes, and hiking to access and enjoy recreating upon state and federally-managed lands throughout the United States, including those of the National Forest System and Bureau of Land Management (BLM).
RESOURCE MANAGEMENT PLAN PROCESS While the RMP is concerned with 23 issues to be addressed by the RMP my comments will focus on Recreations and Travel Management. Recreation and travel on public lands is a vital part of the social and economic makeup of a Nevada lifestyle. From the Burning Man to the Virginia City Grand Prix the ability to recreate on public lands is key reason people and businesses move to northern Nevada.
I want the following riding areas open without any restrictions and no restrictions limiting riding to existing tails only: Pinenuts Mountain Range, MoonRocks, Hungrey Vally OHV, Salt Wells, Dead Camel, Yerington, Virginia City, and Sand Mountain OHV.
I would like the RMP process to consider all trails open unless specifically marked closed or fenced off. If the trail wasn't accessed by the RMP process, then it shall be open without restrictions. If a trail or area needs to be closed because of environmental issues or concerns, then another area for recreation needs to be opened for new trials or area to ride recreation vehicles. If the process gets into categorizing trails for specific groups, the categorizing of these trails need to be done in the open and presented to all groups effected and allow these groups to comment and advice before implementation
I am a member of the Western States Racing Association, which has had recreation permits with the BLM Carson City District for over 40 years. I'm also a member of the American Motorcycle Association (AMA) and I'm involved with MRANN and District 36 by racing and putting on events. In recent years it has become increasingly harder to apply for recreation permits. The cost associated with these permits has priced volunteer organizations or clubs out of the riding district. The most important area that I want the RMP process to address is recreation application process. I would like all courses on record and trails submitted by clubs and organization to be included in an EA/Environmental Impact Statement. This would increasingly decrease hardship on clubs applying for permits
An obvious situation with respect to the CCD is the fact that the Humboldt Toiyabe National Forest has just completed comprehensive travel management planning for its motorized transportation system. It would usually be incompatible to have a BLM motorized route lead users to the boundary of the national forest where the decision has been made that on the forest the route would be non-motorized. There are numerous other situations where the BLM must exercise care in developing a RMP that is compatible with its neighbors and which provides an ecosystem/landscape view irrespective of ownership boundaries.

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In this EIS, the BLM must document its consideration of and compliance with the "minimization criteria", including analyzing the effects of the designations. Routes can only be designated if the agency can show that ORVs will not damage or harm other resources.

The Center requests that the BLM consider and utilize best management practices contained in a recent peer-reviewed paper by Switalski and Jones.8

The best designed motorized trail system will fall short of meeting the expectations set for it if there is inadequate enforcement. Over the past decades, advances in off-road vehicle technology and performance have enabled riders to drive on nearly any type of terrain, up steep slopes and onto lands previously only accessible by foot. An extensive network of unauthorized, user-created routes now crisscrosses the public lands leading in many cases to a legacy of unacceptable damage to environmental and cultural resources. In this RMP, the BLM must include a viable enforcement component to accompany any proposed motorized trail system. To assist you in that task, the Center refers you to a paper addressing six strategies for successful enforcement on public lands. Although specifically written to address concerns on National Forest System lands, we feel it should apply equally well to BLM public lands and should be used in identifying and implementing a motorized recreation system on the district. 9

8 Switalski, T. Adam and Allison Jones. 2012. Off-road vehicle best management practices for forestlands:
A review of scientific literature and guidance for managers. J. Conservation Planning 8 (2012):12-24. Available at:
http://www.wildlandscpr.org/files/Switalski%20and%20Jones%202012.%20ORV%20BMPs.pdf .
9 Wildlands CPR. 2009. Six Strategies for Success: Effective Enforcement of Off-Road Vehicle Use on Public Lands. Available at:
http://www.wildlandscpr.org/2009-update-six-strategies-success

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The BLM must also ensure compliance with the minimization standards found in 43 CFR §8342.1. These regulations require the authorizing officer to designate ORV routes in accordance with minimization criteria which state:

"(a) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.
(b) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
(c) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.
(d) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established."

In the ruling for the case Center for Biological Diversity, et. al. v. U.S. Bureau of Land Management, et. al. (C 06-4884 SI, filed 9/28/2009) the court found that not only did the BLM have to abide by the minimization criteria, but also must document how it does so specifically for the designations being considered. The use of tools, such as decision trees, is not sufficient unless they specifically address the criteria.5 The court also found that the BLM must show a "rational connection" between the facts considered and decisions made.6

In this same decision the court elaborated on the meaning of the word "minimize" in the regulation, clarifying that it refers to the "effects" of the route designations, such that the BLM is required to place routes specifically to minimize ‘damage’ to public resources, ‘harassment’ and ‘disruption’ of wildlife and their habitat, and minimize ‘conflicts’ of uses.7

5 Opinion, pages 19-30.
6 Ibid, page 31.
7 Ibid, page 30.

BLM was an active participant in assisting us develop the adopted Washoe County Regional Open Space & Natural Resource Management Plan. The Plan and its components address future trail access and corridors; recommended buffers for sensitive natural and cultural resources; future lands for acquisition; recreational,visual, scenic, and water resources. We request that this approved plan and its components be incorporated into the RMP where possible, especially when considering future R&PP properties, disposal lands and providing regional trail connectivity between BLM and Washoe County trail/park systems.

Motorized recreation is a fast growing and important recreational use of federal public lands in Nevada. If such a use is to be allowed on the CCD, it must be restricted to designated trails and roads that have been carefully selected, and cross country travel must be prohibited.

We also feel that competitive speed events do not belong on BLM public lands. Such events are destructive and disruptive to native ecosystems. Their sole purpose is to push the limits of man and machines. The racers pay little attention to their surroundings except as it pertains to their racing. Such events are best conducted on private lands with facilities established for this type of motorized use.

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C. Management plan needs to adopt existing roads and trails.
Aj. All existing routes should be considered opened unless closed
xii. If the average person would recognize what they are looking at is a road or trail being used by OHVs, horses or mountain bikers then it is an existing road or trail.
Xiii. Areas should be managed to limit use to existing roads and trails.
Ak. It is understood the existing roads and trails need to be inventoried. Some may need to be closed to mitigate:
xiv. Environmental and cultural concerns.
Xv. To avoid conflicts with privately owned lands.
1. Need to consider the model provided by the State of Michigan with its network of OHV trails utilizing right of way easements across private lands.
2. Need to give state of Nevada a chance to find a way to encourage private land owners to grant such easements.
Xvi. Eliminate parallel routes.
3. While parallel routes should be eliminated it needs to be recognized that multiple routes from point A to point B is a trail network and not necessarily parallel routes. As long as the network does not give the appearance of an open riding area the network should be allowed.
Xvii. Primary means to mitigate the problem should be to re-route the road or trail around the problem area.
Xviii. The inventory needs to be done with involvement of local enthusiasts groups that includes a process of hands and feet on the ground to reach agreement.

BLM must apply a legal definition of "road" within the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and in fact, close and reclaim such "ghost roads." Some legal roads serve important travel needs and are appropriate for motorized use. However, routes that are not "roads" should not receive equal consideration. The agency has a definition of "road," and this definition should be adopted and used consistently in order to create a regular expectation and approach on BLM public lands. We note however, that merely meeting the definition of a road is not sufficient to justify designating a route. In fact, the BLM must still consider whether a route has negative impacts to sensitive or protected resources, such as by the process recommended in this document, and should only designate those that do not impact these resources.

The legal definition of road for the BLM public lands is derived from the definition of "roadless" in the legislative history of FLPMA:
The word "roadless" refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use.
A way maintained solely by the passage of vehicles does not constitute a road.
(H.R. Rep. No. 94-1163 at 17 (1976)).

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6. Transportation Planning and Off-road Vehicle Recreation

Travel planning requires the agency to manage human travel across the landscape. The land use planning process, which addresses the broader landscape within a planning area, provides one of the best opportunities to make travel planning decisions in the appropriate context. The placement and design of travel routes defines which areas will remain or become roadless, whether they will maintain or become of Wilderness character, and which areas will be disturbed and how. In other words, route decisions determine the fragmentation of the landscape, and, thus, how naturally or unnaturally a landscape will behave in terms of water flow and quality, wildlife migration, and species composition and function.

The Center recommends that the BLM address travel management on a landscape-wide basis by addressing the impacts of all roads in the planning area and accounting for the landscape-wide impacts of these roads. The BLM should establish a travel system that retains the minimum amount of routes necessary to provide for reasonable access to public lands including closure and rehabilitation of redundant roads, roads that serve no visitor or administrative purpose, and roads in sensitive resources areas.

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6. Ensure that the OHV community does not come out on the losing end whenever there is a conflict with another BLM user.
7. Clearly define the consequences to OHV "Bad Apples". These are the people who give the OHV community a bad name and ammunition to the Anti-OHV groups who want to close as much of existing OHV areas to OHV activity.
8. Create an environment where responsible OHV recreationalist are responsible OHV BLM land users.

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3. Final maps should be available on large paper maps as well as downloadable to popular GPS devices, like Garmin and Magellan.
4. Keep most of the same areas that are open today to OHV activity in the final plan.
5. Mapping of existing road should be done quickly and then allow all OHV groups at least 2 years to review and comment on the mapped (inventoried) roads.

Because of its proximity to the City of Sparks, the Canoe Hill area would make an excellent hub. Utilizing a formalized partnership with local mountain bicyclists, such as the Tahoe Area Mountain Biking Association, could allow an area of unmanaged recreation to become a legitimate riding destination for northern Nevada.

An example of the model is Fruita, Colorado and Moab, Utah. Both cities host extensive stacked loop trails and trail systems and serve as riding Hubs connected by the Kokopelli Trail. While this example is huge in scale, a proportionate system could also serve the Carson City Field Office and the surrounding area.

A Hub is an area in the front or side country that is relatively easy to access. The area features a higher trail density with a stacked loop system that could offer beginner, intermediate and/or expert trails, as dictated by the management needs of the area and the landscape. A Hub could also include hiking only trails, and trails that provide access to other recreation resources such as rock climbing sites or river access points.

The Spoke trails are connections between Hub areas and other destinations such as home, community amenities, other developed recreation sites and into the backcountry. Ensuring that the areas are interconnected creates benefits such as allowing trails to be used for transportation as well as recreation. This also allows recreational riding to begin from home, eliminating the need to drive to the trailhead and adding value to local properties.

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Thank you for taking the time to consider this feedback on Carson City Field Office RMP. The International Mountain Bicycling Association (IMBA) considers the BLM to be at the forefront of managing mountain bicycling on public lands. The BLM is the only agency to have a mountain bicycling specific strategy1 and has been very receptive to trying a variety of partnership concepts to develop progressive trails and management regimes. In order to bring that same level of sophistication to the Carson City RMP we ask that the BLM engage in landscape scale trail planning.
Wilderness, Wilderness Study Areas & Other Special Designations The Burbank Canyon WSA and the superimposed Scenic Area designation is bounded by two main access routes into the Pinenut Mountains- Rickey Canyon road on the south and Red Canyon road on the north. We request that there be a "setback" implemented so that a vehicle can be safely and lawfully park on the "protected" side of the road (this set-back also to apply to all cherry-stemmed routes).
Rights-of-Way: The RMP should evaluate existing rights-of-way. Unused or no longer needed rights-of-way should be revoked and, if disturbed, should be rehabilitated. Any new rights--of-way should be located in already disturbed areas, such as along roads, as much as possible, avoiding potential losses and fragmentation of intact sagebrush habitats. Utilities should be consolidated into existing rights-of-way, as much as possible. Core priority habitats for the Greater Sage Grouse and other TES species should be excluded and/or avoided for rights-of-way.
Executive Order (EO) 11644, as amended by EO 11989 provides clear and explicit direction to the BLM regarding the use of off-road vehicles (ORVs) on the public lands. The purpose of these EOs is to, "ensure that the use of ORVs on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands." Section 3 of the EOs speaks to the designation of areas and trails such that: damage to soil watershed, vegetation or other resources; harassment or disruption of wildlife habitats; and conflicts between ORV use and other uses of the federal lands; are minimized. Section 9 of EO 11989 states: "Special Protection of the Public Lands. (a) Notwithstanding the provisions of Section 3 of this Order, the respective agency head shall, whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effects, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence. (b) Each respective agency head is authorized to adopt the policy that portions of the public lands within his jurisdiction shall be closed to use by off-road vehicles except those areas or trails which are suitable and specifically designated as open to such use pursuant to Section 3 of this Order."(emphasis added). In its analysis, the BLM must provide a thorough and comprehensive analysis of the effects and impacts from the motorized recreation currently on-going on the district as outlined in the EOs. The Center feels that the current level and type of motorized uses are resulting in significant damage to soils, desert vegetation and springs, as well as causing significant harassment and disruption of wildlife, including listed species or candidate species such as sage grouse.
The more closed areas to off highway motor vehicles the more dangerous this situation becomes. As the riding areas become less and less, you have more people in on concentrated areas which will mean more accidents.

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My family and I have been active throughout the entire north end of Nevada for over 40 years. We enjoy traveling the entire area. We hunt, sight see and seek out pioneer history in the north state. We have noticed quite a few changes in regards to limiting our travel. We do not approve of the closures and find very little reason for them. We see more damage by the force of nature than that of travel by man. Please keep our land open to us. Thank you.
My husband and I are in our mid-fifties and we both have physical ailments that make most outdoor activities impossible. I have Reflex Sympathetic Dystrophy and my husband has arthritis in his knees and hips. Off-roading in our Jeep allows us to see areas that would otherwise be completely cut off to us. We know many people who off-road and they, like us, never leave the trail or drive over vegetation. Also, there's a saying offroaders go by, "Take out more trash than you bring in". There are hundreds of off-road clubs that maintain trails and educate people about responsible off-roading. There is a very small percentage of irresponsible and ignorant hikers, campers, and off-roaders out there. Please don't punish the majority because of a small percentage of the population. Please keep public land trails open to the public.
With respect to land withdrawals, I believe it is wrong to incorrectly label lands as primitive or wilderness that are not truly so; likewise, to not label regions that are in pristine condition would also not be right.I believe it is possible to come up with reasonable solutions that occomodate 90% of the needs of each group. When considering what lands to leave open, and which to close: 1) Maintain multiple routes of entry and egress from the various areas for ATVs. 2) Assure that the trails connect. Segmentation, or losing the ability to travel from one area to another on one quad should always be avoided. 3) A lot of commerce and trade happens through the use of ATV travel. I would say how much I spend in ATVing each year, but my wife would not be happy to see the amount. 4) ATV time with the family allows teenagers to have some fun with their parents in the great outdoors. As we age, the ATVs take the place of the hiking that I used to do so extensively. My knees just aren't what they used to be, and an ATV provides me access to the outdoors. 5)Develop community forums or associations to help us self-police our activities. I am not against helping to build trail signage to help keep people on the trials.We help clean our trails. 6)Encourage people to thoroughly clean their ATVs to prevent the spread of noxious weeds.
A plan for the use of the lands must assure that passage through the lands is maintained through the dedication of specific roads and trails for the use of ATVs, while ridng thoughtfullly and intelligently. It is a matter of balancing the opportunity through the use of ATVs to explore our western lands while at the same time preserving the beauty of the lands for the enjoyment of all.
Please do not shut down any more area than you already have. I am a sportsman that uses the rural areas in this state on a regular basis. I do not see any point in making more land inaccessible to the people that use it. Is it money, are BLM employees just trying to create jobs for themselves, I don't understand. Please stop.
My family uses the blm on a monthly basis. We use sand mountain, ohv in redding, ohv areas in most of California. We love the outdoors and respect it for what it is. You must not restrict these lands Good management of these lands is one thing but to stop their use by the public will be wrong.
To whom it may concern, I am interested in keeping as much BLM land available as possible. I've seen 'wilderness study' areas all over our land and it seems too restricting. My family rides four wheelers and we go to the Black Rock and Smoke Creek areas at least three times per year for camping, exploring, geocaching and photo shoots. It would be a real shame to limit access to any of our wilderness areas for the public to enjoy. Thanks for listening.

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"Public Lands"....hmmmm. I wonder what PUBLIC means???? Oh, that's right. It means it belongs to the PEOPLE! Excuse me, but, I believe BLM is just supposed to care for public lands and make sure they remain public. I don't ride. Haven't for years. But I believe that our lands should be left open for people to enjoy. The tree huggers are just selfish liberals who don't think of anyone but themselves. They can't conceive of enjoying the land for anything other than isolating it from everyone so they can say "Look what I"ve done." Leave the land accessable to riders. It's their land too.
Dear sir or madame, Please do not not restrict or ban the use of ORV's on our public lands.
I would like to see everything open unless specified closed and minimal "wilderness". I consider myself a "environmentalist" because I care about my OHV areas and I always clean up tons of trash out there and always will. Thanks for your consideration.
Just a note in regards to public land closures. Despite doing so all over the country, you have no authority to deny public access to public lands. I am strongly against public land closures, travel management plans or restrictions of any kind !!!!!
I support the Spanish Springs Canyon/Canoe Hill Trail. Please allow the Canoe Hill Trail Association as well as other Volunteers, Stakeholders, and Trail Supporters to maintain this busy and flourishing multi-use trail network. This trail provides much needed outdoor recreation for many groups of enthusiasts in an area of Reno-Sparks-Spanish Springs with very limited outdoor recreational opportunities. Most importantly this trail provides a safe place for the youth of Reno- Sparks-Spanish Springs to enjoy, learn, and recreate outdoors in our wonderful State of Nevada.
Please keep public lands open to the public. This includes the use of off highway motor vehicles. As tax payers we should have the right to use the land that is public.
It is hard for me to believe that you can not see what you are doing by closing our public lands or restricting our use and enjoyment of these lands. I know you believe that you are doing what is best for everyone, and that your lively hood and quality of life is dependent on your employer, the federal government, Do you have the strength of character to be your own person, and to recognize the fact that you have the ability to return our country to the people. It is time for all Americans to stand up for what we believe!! This public land closer may not affect you personally, but soon the government will impose restrictions, closures, or policies that will directly impact you and your family, and your quality of life.. It is just a matter of time...! Do not be part of the problem, give our country back to the people. Do the right thing!
To restrict access to public lands would be going against what this country stands for; freedom and liberty. Public land access restrictions will only promote unsafe and irresponsible use of the same. I believe people will not give up their rights to use public lands, so trail closures will skyrocket illegal use of the land increasing erosion and environmental impact. Resources should be aimed at maintaining trails and general infrastructure to promote responsible use of the land instead of them being used to barricade trails and restraining people from using public lands. A place with well maintained trails will considerably increase quality of life while minimizing environmental impact. Recreation is a key part of a healthy society and it is in human nature to spend time outdoors. For these motives public land closures make absolutely no sense. Closures and restrictions appear to be more of an excuse for poor management instead of an environmental, social or economical decision.

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This email is to comment on the Carson City District Resource Management Plan. We use BLM lands often when we go hiking, jeeping, camping, hunting, fishing, and biking, and want to object to any type of restrictions or prohibitions that would interfere with our access to public lands. As outdoor recreationists and enthusiasts, how we recreate is our choice and not someone else's responsibility to tell us what we can and can't do. We pick up trash and clean up trails when using BLM lands, and respect other people's recreation choices. We expect the same. We just hope this plan is not your attempt (as the U.S. forest Service has previously done in their Travel Management Plans) to keep people off of our public lands that should be available for all of us to use
"I am petitioning the BLM board by requesting that the existing rule be modified to allow competitive motorized FSA events at SM Nevada Recreational Area".
I'm very interested in the canoe hills trails at Eagle Canyon Regional park being open for use and included in the RMP process. This loop system is currently a social trail being used by mountain bikers, hikers, trail runners and others. It is vital to the recreational pursuits of the people of Sparks and one of the only areas of this sort within the eastern truckee meadows.
I am concerned that areas will be closed to Dirt Bike riding and racing. This activity is extremely important to my family and I. Most of our riding occurs in the Pine Nut Mountains, however, we compete in the MRANN and Virginia City Grand Prix events which encompasses other areas managed by the BLM. We have been devastated by random closures that appear to occur with no warning. Ie the Jacks Valley area managed by the USFS. Thank you for allowing us to comment on this very important issue.
I am strongly opposed to this measure limiting access or prohibiting use of the public on public lands. Especially prohibiting hunting, fishing, off road use or recreational shooting.
Dear Sirs, After 40 years as a dirtbike rider, I see the single at present is a mess. Make it directional loops, take the criscrose out. Post rules on roads to who has the inside track. Post miles and average time to travel loops. Add and opean up rest spots.
Hello my name is Victor Yohey and I would like Public Access to Public Lands! As an avid hunter, motorcyclist, and just all around outdoorsman who respects that land please don't take away Public Access. If you take away this access to public lands many families will loss the ability to spend clean wholesome fun and time with each other. In todays world many children resort to other activities that lead to a live time of crime. If people do not respect the use of Public Lands then enforce them not those that do. Put the information out there as to who one can call if they see abuse of public lands. Enforce with more Ranger Patrols. I think I have seen 2 in 25 years.
The CVTA works closely with Douglas County on implementing the County's 2003 Comprehensive Trails Plan, which this proposal closely follows. CVTA also works with the USFS, The Nature Conservancy, private landowners, the Washoe Tribe, Carson City, and numerous other entities to develop and maintain quality trails systems in the Carson Valley area. CVTA has developed about 30 miles of trail elsewhere within Carson Valley, including about 10 miles of the Discovery Trail.
As population centers along the borders of public lands continue to expand and more people are turning to public lands for recreation, lack of direct management in terms of identifying areas as suitable for recreational shooting has created safety concerns and conflicts with other recreationists in other areas. The end result in nearly every case is that long-established recreational shooting sites are being closed causing shooters to travel further afield from home and roads in order to enjoy their public lands. It also has the effect of moving displaced shooters into areas that may be" at the maximum level of-sustaining safe shooting. Identifying popular and suitable recreational shooting sites in the RMP will provide a much needed anchor for this activity and will ensure that management decisions such as trail development does not conflict with established public use.

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The ability to access public lands has also become a significant factor. Even though much of the public land that BLM manages is open to hunting,the ability to access huntable areas has a tremendous impact on hunters who rely on public lands for their hunting opportunities. Many land management plans are designating which roads and trails will remain open or be closed to off highway vehicle (OHV) use. Many hunters depend upon OHVs to get to huntable lands and to retrieve legally taken large game animals. If the District will be including vehicular access as part of the RMP, we request that the impact of any road closures on hunting, as well as recreational shooting, be addressed in the RMP.
Wild and Prescribed Fire, Fuels Management, and Emergency Stabilization and Rehabilitation (ES&R) NDOW recommends wild and prescribed fire, fuels, and ES&R (collectively termed Fire Program) focus on managing for rangeland health and integrity. We recognize that decisions must be made with limited resources in regards to prioritizing suppression, fuels management, and rehabilitations efforts. NDOW encourages the CCD to model travel management plan addressing OHV issues. Items we recommend addressing in the travel management plan include: 1. Permanent Road Closures: We support the closure of duplicate destination roads, no longer used mine exploration grid roads, and mitigation of resource impacting or degrading routes. Increased road densities have been proven to impact wildlife through habitat loss and fragmentation, increased stress levels demanding higher energy requirements, and direct mortality. We encourage closed roads to be reclaimed. We discourage the elimination of sole source access that provides a road option for wildlife recreationists. 2. Temporary Road Closure/Seasonal Restriction: We encourage temporary seasonal restrictions to occur on roads to avoid wildlife resource impacts. For example, seasonal restrictions should occur in crucial mule deer winter ranges during the winter season to lessen stress. 3. Overland travel and unauthorized user-created roads: We understand and support the need to control the ever expanding network of new trails created by individuals into areas without roads. We recognize the resource damage that can occur and are willing to cooperatively work with the CCD to prevent its occurrence. 4. Game Retrieval: We support allowing challenged hunters the opportunity for game retrieval. 5. Signage: NDOW suggests marking "closed" roads as such and leaving "open" roads un-marked. Signage is a direct way to inform users of closure and is not dependent upon the individual having a travel management map in their possession. 6. Law Enforcement: We encourage increased law enforcement activities to address unauthorized use. Additionally, we encourage unauthorized use reporting. Furthermore, a coordinated process should be developed jointly by NDOW and the BLM as it is our expectation that the majority of the violations will be documented by NDOW wardens who have no enforcement authority over federal regulation pertaining to travel restrictions. 7. Education: We encourage educating the public and OHV user groups about the potential wildlife impacts that are associated with unauthorized travel. We also encourage working cooperatively with OHV groups to build trust, ensuring participation and increasing unauthorized use reporting.
It is my desire to see public land remain open to the public. I would like to see off road vehicles including dirtbikes, buggies, trucks, and other off road vehicles continue to have access to the current off-road trails. I'd like to see the government work together with off-road clubs to ensure a racing community can continue to race. I also hope that the historical Vegas to Reno Race can continue to prosper.

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As a Nevadan resident and parent of two children I rely on our open space lands to keep my children busy and out of trouble. We as a family use the lands almost every weekend for motorcycle riding, bicycle riding and camping. We as a family are also members of the MRANN racing association and have open desert races all through the fall and spring. The MRANN group has found it increasingly more difficult and expensive to acquire permits for our FAMILY racing events. We leave our racing areas cleaner than we find them, we also have yearly clean up events where we clean up garbage from other BLM lands. I have a hard time trying to understand why the BLM and federal government wants to close more and more of our public lands, one of the reasons I settled in the northern Nevada area is for the abundance of public lands to explore as a family event. I would have to say I am against the closing of any public lands to motorized vehicle traffic and see no reason why these lands cannot be shared by everyone.
My concern is that the BLM is losing sight of the fact that public land is owned by the public, therefore the BLM should be making an effort to improve and encourage land access by the public rather than making access more restrictive. Public uses such as camping, hiking, hunting, fishing, ORV riding, shooting, sightseeing, and so forth must be ENCOURAGED rather than DISCOURAGED. Making more areas either off limits or making legal entry so complex that the majority of people are not able to access lands legally is wrongheaded and is NOT the duty of the BLM. Any new rules or laws that restrict land use by the private individual are not in the interest of either the public nor in the interest of longevity for the BLM.
3. Access restrictions should be carefully thought out with a priority in protecting the lands, vegetation and wildlife. All public lands should be accessible to the public with vehicular access limited to existing roads and trails. No existing roads or trails should be closed without careful consideration of an access plan for the respective area/range. A road on every ridge and in every drainage is damaging in a lot of ways, but prohibiting vehicular access to an entire range is preventing access by the public and should not be allowed. Public multiple-use should be encouraged, not discouraged.
I am concerned that the BLM will close our OHV Recreation Areas. I grew up using these areas, my family now uses these areas, and I want my children's future families to be able to use them. My livelihood (my job) depends on OHV Recreation and if these areas are closed my company will lose money. I love living in Nevada because we have so much freedom to recreate. Please keep our trails open!
I'm writing because I'm an avid offroader, camper and hunter in NV. I enjoy getting out with friends and family in our beautiful outdoor areas we have here. I do not want to see trails shut down that my future kids and friends will never get to see because of this. We always practice the tread lightly moto and leave things better than when we came. I've also participated with groups like Reno4x4.com for trail maintmence and cleanups. Please keep in mind that most of us are responsible outdoorsman and help keep things just as beautiful and full of life as they are. Most of the offroaders in the area would be more than happy to help maintain trails where funds do not allow so. Thank you for your time,
I am writing this to whom it may concern this as i am out of town on business for the the public meetings concerning any area that might be closed to off-road use.this was brought to my attention from an email sent to me by ktm of reno, a local motercyle retailer.I am against any type of closure to any off road use.It blows my mind how goverment can take my tax dollars and do what u THE GOVERMENT WANTS ANYTIME ANYWHERE AT YOUR WILL.enough of making public lands into so called wilderness or limit there use to a selected few.
CVTA also supports retention of those areas around this proposed trail system to remain in public ownership, whether by BLM or Douglas County for the future enjoyment of all users. These lands are used extensively by many recreational user groups and activities. Retaining the open landscape and character of the area will protect fauna and flora resources, preserve historical an cultural values, keep viewscapes intact, and maintain public access to current urban front areas.

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We the American people are dam pissed off at the BLM, Forest Service, and every dam Government groups that are stealing our liberties, freedoms and rights to use our public ands, closing them off and caving into all these environmentalist wacko nut cases, your not saving a dam thing and you know it, it's always been about power, control ,and of course money, and you will stop at nothing to do it, well we want it stopped and right now, we don't want or need anymore dam wilderness, or roadless place's in our country, we have way to many alread thank's to all of you lying leftist ass/holes.
AREA 1 (inside the dotted blue line): I honestly ride in this area around my home (the blue dot) at least once, and often twice, each week, year round except during periods of heavy snow. I rode in this area 12 times during last December alone. Yes, I am an avid rider, perhaps an addict. It's a quality of life thing for me. This area is already limited by the Sand Hills seasonal restriction, the Petersen Mountain Natural Area, the Fred's Mountain restrictions, Winnemucca Ranch locked gates (illegal?) blocking Black Canyon and access to the Virginia Range, the Hungry Valley Indian Reservation, and the Pyramid Reservation. Please keep all the existing roads and trails in this area open without restriction.
I have lived and regularly ridden in northern Nevada for over 15 years and highly value the exceptional motorcycling opportunities available here. It is the primary reason I choose to live in northern Nevada. PLEASE do not further restrict motorcycle use on BLM managed lands. ALL existing roads, trails, and single-track should remain open.
We are currently in the beginning phases of an EA on this project with the BLM, approximately 45 miles of non-motorized trail open to hikers, dogs, equestrians and mountain bikes. This includes four community loop trails near urban areas for residents and visitors to use. This project will provide a non-motorized trail system opportunity and would be constructed, signed and maintained to typical non-motorized trail standards. CVTA does not advocate any closures or changes to existing motorized use across or outside of this new non-motorized trail system.
The Carson Valley Trails Association (CVTA) has been working with the BLM for several years on an east Carson Valley non-motorized trail system, relatively close to the urban front area. Much of this trail system will become part of the Discovery Trail, anticipated to become a National Recreation Trail and theme trail around the entire Carson Valley showcasing the areas rich history, culture and natural resources.
I am a hunter, target shooter, mountain biker, and hiker in Wellington. It is critically important to me and my neighbors for BLM and other public lands to remain open for hunting and shooting. Vehicular access is also extremely important because that is the only practical method of bringing in our recreational equipment. Please keep the public lands open for all of us.
We encourage the BLM to continue to work with the various clubs that sponsor responsible outdoor public land use activities; off-road motorcycle racing organizations, 4WD clubs,etc. and appreciate all the efforts of BLM to keep the freedoms we have as Nevada public land users. We hope to enjoy them for many years to come.
My main concern is access to trails and OHVs.
Travel will be restricted to designated roads.
the Four Stroke Series helps fix all of these by showing people a safe way to race, plus bring people back to sand mt. With the Four Stroke Series and there track record in other locations it should be obvious the upside it would have for the area. BLM should be asking them to have a race instead of making them jump through hoops every year just to be shot down. I hope the BLM will see what I see and what the other parks have seen to they make the correct decision.

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In closing, I want the BLM to minimize bans and restrictions to only those few cases with a truly compelling need and to prepare composite maps so citizens can grasp the full and complete impact of all proposals. Please, be careful!
The proposed trail system currently goes through areas identified by the BLM as potential disposal areas. CVTA recommends a minimum of 600 feet of trail corridor per each side of the trails to be retained in BLM management if future BLM land disposals were to occur. This protects the trails while preserving a wildlife and open space corridor. The following locations are where the proposed trail system and identified potential BLM disposal areas overlap: McTarnahan Hill Quad, Southeast quarter of section 26, T.14N, R. 20E McTarnahan Hill Quad, East half of section 35, T. 14N, R. 20E McTarnahan Hill Quad, East half of section 1, T. 13N, R. 20E Gardnerville Quad, Southwest quarter of section 28, T. 13N, R. 21E Mt. Siegel Quad, Southwest quarter of section 11, T. 12N, R. 21E.
8. Need for connecting existing routes and areas in the CCDO and adjacent offices. Similar to the concern mentioned above, BRC encourages the agency not to "land lock" trails or areas. Long term planning that allows, or at least does not restrict, connecting recreation opportunities within the CCDO and beyond should be considered.
I am against any plans that will restrict access to BLM lands in Nevada.
G. Comments regarding "Issue Questions" in CCDO's RMP Planning Scoping Handouts (Fact Sheets) In order to inject a bit of land use humor, we'll call this section the "thanks for asking" section. In all seriousness, and despite our quibble in section E 1, we do appreciate the information and questions in these "fact sheet" (scoping handout) documents. 1. Comment on document 3.1 "Recreation and Travel Management" • Do you prefer non-motorized travel (hiking or equestrian trails? • Do you know of areas that you would like to see designated as open, limited or closed? • Do you see the need for more routes of travel for motorized or non-motorized use? Do I prefer non-motorized travel???? Not; "what kind of trail based recreational activities do you enjoy and where do you enjoy them?" How does such a question assist the BLM in determining the recreational preferences and desires of visitors to the CCDO? It cannot. It seems obvious that this set of questions is designed to weigh the planning effort toward establishing a "purpose and need" statement to provide more non-motorized opportunities. The question (do you prefer non-motorized travel) raises significant concerns regarding whether or not the planning team holds a bias against motorized users. Numerous provisions of law and regulation specifically preclude the agency from deliberatelynarrowing the purpose and need statement to bias the decision or narrow the range of alternatives.

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5. Comments regarding Issue 4 as identified on the issues webpage; "Cultural Resources, Native American Concerns and Paleontology Resources" Clearly, the issue of "cultural clearance" of designated roads and trails (both motorized and nonmotorized trails) will have to be addressed in the RMP and the TMP. It seems unreasonable to require that every linear mile be "cleared" before the TMP is finalized. It seems logical therefore to develop process for complying with the cultural clearances on recreational travel routes. Naturally, BLM must coordinate with the State Historic Preservation Officer regarding what will be necessary to be in compliance with law and regulations. The BLM should utilize any cultural resource inventories conducted pursuant to livestock grazing allotment analysis and Special Recreation Event permits. Finally, with tongue only halfway planted in our cheek, we'll add "ditto." (Please see our concerns above and in Section C) as well as add that if "Native American Concerns" rates as a "Significant Planning Issue" then "State and Local Government Concerns" certainly should as well.
BRC emphasizes that the agency has documented the increase in popularity of OHV use and the need to provide sustainable travel routes for motorized recreation. This need has resulted from both an increase in the popularity of OHV use and the elimination of OHV opportunities in the area. It is necessary to develop an Alternative that will focus on the designation and development of motorized trails in the CCDO. At least one Alternative should be developed that enhances motorized recreation. Significance criteria could be miles of routes closed, number of motorized loops closed or other similar quantifiers
Motorized recreational opportunity has been drastically reduced throughout the region. Travel management plans on adjacent BLM and National Forest lands have reduced opportunity for motorized recreationists, while at the same time provided additional opportunity for those who prefer a non-motorized experience. Future restrictions, including road and trail closures pursuant to the recently finalized Humboldt-Toiyabe National Forest Travel Plan, as well as adjacent BLM Offices in Nevada, will amplify this situation.
Issue 2: Cumulative loss of OHV recreational opportunity The issue of "Cumulative Loss of OHV Related Recreational Opportunity" is a significant issue that should be incorporated into the analysis and into the decision making process.

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D. Suggested Significant Planning Issues

BRC requests that the CCFO consider the following two suggested Significant Planning Issues and encourages the BLM to incorporate them into the planning and develop appropriate alternatives addressing each.

Issue 1:
Concern over the diminished role the multiple-use sustained yield mandate in current land use plans. The agency, numerous academic studies, as well as elected representatives have documented the controversy over the agency's multiple-use sustained yield mandate and society's increasing value of conservation and preservation of public lands.

In addition, over the last two or three decades, a lot of land has been removed from multiple-use management via land use planning and legislation. The percentage of BLM lands under true multipleuse management has been drastically reduced, and the remaining multiple use managed lands are extremely important. In other words, we have reached a critical mass. Every single acre that is removed from multiple-use management is extremely important.

And as noted above, many of the preliminary planning issues are redundant and may serve to further diminish the agency's multiple-use sustained yield mandate. We request "The Diminished Role of Multiple-use Sustained Yield Management" be identified as a planning issue and brought forward for analysis. The BLM should briefly discuss the role of multiple-use sustained yield had in the passage of the FLPMA and its importance to states that are "blessed" with huge amounts of federally managed lands. In response to this issue, at least one Alternative should seek to enhance multiple-use sustained yield management across the planning area.

NEPA and BLM's planning guidance imposes a mandatory procedural duty on federal agencies to
consider a reasonable range of alternatives or preferred alternatives analyzed during a NEPA process. 40 C.F.R. § 1502.14; 40 C.F.R. § 1508.9. "[A]gencies shall rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14. The alternatives section is considered the "heart" of the NEPA document. 40 C.F.R. § 1502-14 (discussing requirement in EIS context). There is a need for, and BRC strongly encourages the CCDO to develop, an Alternative that emphasizes and enhances a wide range of diverse recreation opportunity, including an Alternative that emphasizes and enhances a wide range of diverse opportunity for motorized and mountain bike enthusiasts.

3. The agency should disclose which routes will be classified as BLM Roads, Trails and Primitive Roads.
The DEIS and draft TMP should specify if a route is a Road, a Trail or a Primitive Road pursuant to agency directives.

B. BLM must develop a wide range of Alternatives responding to Issues raised by the public BRC supports active recreation management on all public lands and National Forests. Insofar as active management of OHV use, the OHV community generally supports the "travel limited to designated roads, trails and "managed open areas" paradigm. The OHV community also supports the need to revise Land Use Plans in response to changing conditions. And the OHV community also understands that not every area is appropriate for OHV use, and areas need to be provided for nonmotorized and primitive recreation opportunity.

What we do not support is being presented with a "range" of management alternatives which all represent a significant reduction in OHV and other recreation opportunity.

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4. Comments regarding vehicle dependent dispersed camping Any TMP is also a vehicle camping plan. Therefore, vehicle dependent dispersed camping must be considered in the TMP decision making process.

Although we lack specific knowledge of much of the CCDO, we feel safe making the intuitive observation that vehicle-based camping is one of the most popular activity occurring in many areas. Suffice it to say, people seem to feel very strongly about the activity. BRC describes it as a convention, a birthright, a custom, a habit, a heritage, an inheritance, a practice and a ritual all wrapped into one. It is also an activity that is difficult, but not impossible to manage.

In other BLM District and Field offices, planning staff have sometime assumed it will be able to completely change all vehicle based camping by simply signing a new RMP and TMP. Like turning on or off a light switch. Such an assumption is neither workable nor reasonable. BRC often says; "camping ethics must evolve -- they cannot be changed simply with a signature on a land use plan."

We believe an appropriate desired future condition for vehicle based camping is; "allowed where it has been determined to a) not cause considerable adverse effects; and b) managed in a way as to minimize impacts to natural resources." In order to reach this or a similar future condition, the obvious question then becomes how to transition to this future condition from the status quo, which in many areas would be the virtual absence of any attempt at management.

We'll say again that site-specific, on-the-ground management prescriptions must be supported by correspondingly-detailed data and analysis. See 40 CFR § 1502.24. The DEIS should adequately fulfill NEPA requirements regarding accurate and adequate description of the decisions being made as well as the impacts across the various alternatives. It must be possible for the public and the decision makers to reasonably determine what affects each alternative will have on camping.

7. Need for "point-to-point" recreation opportunity.
Long distance, "point-to-point" recreation is becoming increasingly popular with motorized and mountain bike enthusiasts. The CCDO is a key hub for this type of recreation. BRC strongly encourages the plan to acknowledge this need and direct activity planning to meet the current and future need.

5. BRC emphasizes the need to provide for trials motorcycle and 4x4 rockcrawling opportunities in the revised RMP.
Trials motorcycling and rockcrawling are very popular in the area. There are many areas in the CCDO where providing this type of use can be provided in a sustainable and manageable manner.

The Planning Team is cautioned not to segregate users who value the "open" designation into smaller and smaller areas. Crowding users who require the "open" areas can increase safety risks to the public as increasing numbers of OHV enthusiasts are compacted into ever-smaller areas. "Managed Open Areas" should be large enough to effectively and safely provide for the current and anticipated recreational use.

The Planning Team should seek input from county and local governments, individuals and OHV clubs for input on where popular play areas are located and how they could be better managed.

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4. BLM planning must recognize and address the need for the "Open" designation where appropriate. There are areas that have long been used for cross-country OHV activities, with little or no significant adverse environmental impacts, such as the Hungry Valley/Moon Rock "play areas."

Some open areas are recognized for their high OHV popularity and should be kept available for those who value this type of recreation. Other examples of valued "open" designated areas are: dry lake beds, staging areas that provide recreationists to gather before and after traveling on OHV trails and "Tot Lots" where children and young adults can recreate with their friends in an area close to parental supervision. Some OHV events, such as trials competitions, require the "open" designation to be viable. Staging areas for competitive and other commercial events are another example.

The Planning Team will, no doubt, receive many letters from members of wilderness advocacy groups and "quiet" recreation advocates indicating the overwhelming need for a non-motorized recreational experience. When considering the input of people who desire an experience away from those who use vehicles for recreation, the Planning Team must consider the already abundant recreational opportunity available to those persons both within and adjacent to the planning area.

BLM should also take this into consideration when/if the consideration of minimizing recreation conflict is addressed in the revised RMP. BLM must recognize the abundant opportunities already present for "non-motorized" solitude. Wilderness advocacy groups often assert that there are conflicts in values anywhere and everywhere OHV access is permitted. But BLM must balance the many venues presently available for wilderness or non-motorized recreation experiences and the relatively small numbers of people who recreate in wilderness areas. The relative minority cannot be allowed to destroy the recreational opportunities of the majority, especially where they already have abundant non-motorized recreational opportunities.

3. BLM should take into account the motorized niche and historical OHV use in the planning areas, as well as the already existing and recently expanded non-motorized opportunities available throughout the region. BLM planners should take into account the motorized recreational niche of a significant percentage of the planning area contrasted with the substantial already existing and recently expanded nonmotorized opportunities when balancing the input from conservation groups who desire that motorized recreation be drastically reduced in order to provide for non motorized recreational experiences.

2. There is an increasing demand for OHV recreation opportunities.
Clearly, there is an increasing demand for OHV recreation opportunities on public lands and National Forests. BLM's OHV Strategy states, "Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management (BLM) has increased substantially in recent years... Some of [the factors contributing to growing OHV popularity] are:

- greater public interest in unconfined outdoor recreational opportunities
- rising disposable income ...
- advances in vehicle technology
- the rapid growth of the West's cities and suburbs...
- a population with an increasing median age with changing outdoor recreational interests

This [growing OHV] popularity is evidenced by the fact that recreational enthusiasts are buying OHVs at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers.

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A. General comments Below are 9 general comments to be considered when formulating alternatives for the RMP and Travel Plan.

1. General Comment.
We briefly polled a few of our members who regularly visit the CCDO and live in nearby communities and they were very specific insofar as what they would like to see in a new Land Use Plan: More Single Track Trails (motorcycle and mountain bike)!! More ATV trails!! More 4x4 trails!! More Rock Crawling Trails!! Some were also concerned about the potential loss of designated "open" areas.

(They asked us to make that point with BRC's characteristic gusto so that you folks on the planning team would incorporate this important concern into the decision-making process.)

B. BLM must develop a wide range of Alternatives responding to Issues raised by the public BRC supports active recreation management on all public lands and National Forests. Insofar as active management of OHV use, the OHV community generally supports the "travel limited to designated roads, trails and "managed open areas" paradigm. The OHV community also supports the need to revise Land Use Plans in response to changing conditions. And the OHV community also understands that not every area is appropriate for OHV use, and areas need to be provided for nonmotorized and primitive recreation opportunity.

What we do not support is being presented with a "range" of management alternatives which all represent a significant reduction in OHV and other recreation opportunity.

Here in Nevada we enjoy all the open BLM land to explore, hunt, & shoot with few restrictions. This is a state where you can feel free from government restrictions, one where you can enjoy the outdoors often without seeing another person for days at a time. Let's keep Nevada BLM land open with no more added restrictions or off limit areas to shooting, hunting, or off road vehicle use.
KEEP NEVADA BLM LANDS OPEN FOR ENJOYMENT is my final comment.

As you may have noticed, the Sparks side of Canoe Hill is being defaced by off roading. Perhaps a vehicle trail is inevitable on this highly visible landmark, but I wonder if you would find it feasible to designate a single trail, with signage, as I believe was done with some success on Peavine. Perhaps users could be encouraged to use only the back (east) approach. Ialso note that occasionally, people dump large appliances and tires atop Canoe Hill. There was a deposit there a few weeks ago. I do not have the equipment or strength to take such things out. There seem to be relatively few abusers, and periodic pickup would probably keep us abreast of the problem. There is considerably more abuse on the Sparks side of Canoe Hill (above the water tank); at least it is generally concentrated out of sight.

Please be cautious and tread lightly when it comes to making your decisions regarding your proposed revisions. Many roads and other forms of access have been righteously closed for protection reasons over the years. I'm sure there are still more places of access that can be reasonably closed. But too many closures and restrictions will only keep future generations from enjoying the land, cause anger from those whom you restrict, and create "criminals" of well-meaning people when the restrictions are too complex. There is also a mire that can be created for the individuals and agencies charged with enforcing the law of the land.

The BLM is a multiple-use agency and among many activities, hunting and recreational shooting are allowed. However, in recent years, the agency has been systematically closing large areas of public lands to recreational shooting. As a local hunter and shooter I would like that public lands remain open and accessible to these traditional and historic uses of BLM lands. Not only are they safe activities but appropriate management tools for local state biologist.

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As a Nevadan that recreates often in the Carson district, I am very concerned with the revisions proposed to this district. I feel that the changes proposed will negatively impact my families recreation as well as those of other Nevadans. Please keep in mind that public lands are just that, public. The restrictions that have occurred, although not well known yet to the public, will definitely have an impact on all that use our public lands. Whether it is recreating on what's left of our OHV trails, camping, fishing or hunting, these changes will negatively impact all of these forms of recreation.
As I understand it some of those proposed restrictions deal with the use of firearms and off road vehicles. If one can't shoot a firearm how can one hunt game or will that be restricted also? While I have owned and driven 4WD pickups for some 40 years I don't consider myself an "off roader" as I always stay on established roads. However, I truly believe your restrictions and closures will eliminate those roads from the maps and you will effectively close off vast areas to access.
I protest planning to modify BLM RMP to prevent access to federal land. Creating a matrix of restricted use essiantliy does this. I also complain about the hush-hush method that the planning process has taken. I also complain that BLM maps are not on the planning web-page as the planning page states they are.
First of all I would like to thank those whom work to keep our public lands open and accessible. My name is Edmun Santos and I live in Gardnerville. These are the important items to me with my Public Land use. I ride and hike the Pine Nut range, and go as far as Dog Skin Mountain for my recreation. I also like to watch event's in these Public Lands such as motor sports. I would like to have see more challenging single track, and sandwashes, for my recreation. I would like to express my satisfaction to the Staging area's now in use at the areas of my recreation and see no need for bathrooms, running water, etc. As far as maintenance I feel a clean up that includes public volounteers, is needed in some problem areas. Communiction however would be the challenge in this effort. At least getting the word out to the folk's that are willing to participate in these effort's. I would be willing to receive e-mails. I also feel areas should be dedicated to certain uses to avoid conflicts that may cause a safety issue or dispute's between recreationist.
I want to go on record that I oppose the closure of areas and roads onto publicly owned lands that are maintained by BLM & the Forest Service.
I know that in the past decade there has been a number of areas designated as Wilderness Areas in Nevada. At the beginning I could understand why it was being done even if I did not agree. I now believe this has gone too far and too much prime recreational areas have been taken away from the average person. Many people are not able to get back into the areas, not having horses or the health. Areas can be protected for the people without taking it away from the people.

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2. Regarding routes with contested and/or overlapping or concurrent jurisdiction . The Final Plan and ROD must more completely address routes which are subject to overlapping or concurrent jurisdiction, such as routes identified as county roads. BRC supports and appreciates the agency coordinating their planning with state and local governments. See, e.g. 43 U.S.C. §§ 1720, 1744. This process should recognize routes that are asserted as valid existing rights of ways by the state and the county. We understand that the agency may elect to simply state that only a federal court can adjudicate the validity of a contested right of way. However, this is not the only option open to the BLM. Also, it seems reasonable for the agency to include a concise discussion regarding the dispute over county roads in the analysis.
With respect to bikes on horses on the same trail, it's all fine and well that you say we can train our horses, but we need to consider training the bicyclist. Many times when I share the trail with them on Lakeview, which also has a steep grade I find myself hiking on foot on the way down because they come up on you faster than they should. It's hard when you are on a bike negotiating the turns at fast speeds and then having to slow down for horses who can't move out of the way as fast as a pedestrian.
PLEASE, PLEASE DO NOT OPEN UP ANY TRAILS TO MOUNTAIN BIKES THAT ARE NOW ONLY FOR EQUESTRIAN USE.
A fully planned and developed system of interconnected Hubs and Spokes will form an intentional and integrated trail network that meets the experiential and access needs of a majority of trail users. If these experiential and access needs are proactively managed through system wide trail-planning incidents of conflict and resource degradation can be avoided. We ask that the RMP incorporate a comprehensive trail planning mechanism to work with local mountain bikers and develop an integrated trail network.
Comprehensive Trail System Planning As a landscape scale management model we recommend creating a "Hub and Spoke" system allowing for easier management, providing opportunities for a range of trail experiences, access to other recreation resources and destinations, as well as adjacent public lands
I strongly oppose any further restrictions or regulations that pertain to public use and/or access for all modes of transportation including vehicles, pedestrian, and horses. I support leaving existing access routes open to travel and support improving primary access routes and updating and repairing signs and map kiosks.
In the update of the resource plan, please keep in mind and place as an important element, the interests of full access to hunting and recreational shooting. My wife, family members, and myself fully support hunting and recreational shooting on all public lands. This is a very important resource to us. This right has been in place since the lands become public domain; please keep it this way.
Also, in order to keep the OHV opportunities appealing to the general public the BLM should consider minimizing route closures when a route is determined to be closed, rerouting should be an option as to avoid the problematic area such as but not limited to: sensitive riparian areas, noise sensitive areas, critical sage grousse habitat, etc . Closures tend to eliminate "loops" and create dead-end roads which can take-away from the overall OHV experience. Countless OHV clubs frequently organize volunteer work parties dedicated to trail maintenance and re-routes, the BLM should consider using such resources when the BLM is unable to provide the resources themselves.
In order to allow the current OHV opportunities to remain appealing to the public the BLM must consider keeping the majority of their district as an "open" OHV area while limiting travel to existing routes. Many OHV'ers enjoy technical single-track type trails, while others enjoy wider trails and full size roads, sand washes are also popular, the diversity of route types on BLM land is one of the reasons that many like myself visit the area. Subsequently our visits create tax revenue and help support the local economy. The Pine Nuts Mountain Range is known for it's single-track trails and sand washes.

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The BLM must consider minimal reductions if any to OHV opportunities within the Carson City Field Office's District. The OHV opportunities with the CCFO's District provides priceless opportunities for family recreation that cannot be found anywhere else in the world, OHV in NV and eastern CA is unique to these area's and cannot be found anywhere else.

There is an additional and important concern about the way in which the agencies have described this project. Our concerns is that, because the public was not adequately informed of the scope of this project, and that non-motorized trail based activities will be limited to designated routes, the agency will be reluctant to consider available options for providing non-motorized recreational routes, such as constructing new non-motorized trails when there is a need to address resource impacts and/or recreational user conflict.

From the motorized visitor's perspective, this course of action easily results in a scenario where the existing inventory of motorized recreational opportunity is used as the "inventory" to develop the nonmotorized portion of the comprehensive system. This scenario represents an unacceptable 'systemic bias' against motorized visitors.

If the agency is going to attempt to do the comprehensive plan, then it must ensure the effort has been properly scoped. The agencies should also inform the public of available options, including providing newly constructed mountain bike, non-motorized trails and even motorized trails in order to provide a sufficient trail opportunity for all visitors.

Suggestions:
Alternatives should include:
• Educating the non-motorized visitors about when and where they may encounter vehicle traffic as well as informing them of areas where they may avoid such encounters.
• Educating the vehicle assisted visitor of where the road or trail might be shared with nonmotorized\ visitors and encouraging slower speeds and a more courteous ethic in these areas.
• Re-routing either use so as to avoid sections of roads or trails that are extremely popular with both groups. For example, a hiking trail can be constructed to avoid a section of popular OHV route. Or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc.
• Dispersing all forms of recreational use so as to minimize conflict and create a more desirable experience.

A synthesis of the literature on user conflicts on multiple-use trails, sponsored by the Federal Highway Administration in 1995, tells us that user conflict is not due to any "inherent incompatibility" between different trail activities. It is a perceived "goal interference" on the part of the offended trail user. For example, a hiker who dislikes motorcycles is in no physical danger, but his expectation of a quiet time in the forest is thwarted when he meets a motorcycle rider on the trail. Thus, according to the research, the key element for the elimination of genuine, heartfelt conflict for any given individual is to make sure that every person who uses the trail system knows what to expect, and that the resulting experience is consistent with that expectation (Moore, 1995).

Given the long history of motorized vehicle use in the planning area, visitors who do not use OHVs are used to seeing them. In addition, a large percentage of the CCDO visitors know where to find nonmotorized experiences. Recreation User Conflict is expected to be minimal.

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I've recently read so many things concerning the closure of roads and areas in federally owned lands being maintained by BLM and the Forest Service. I do not want to lose these areas and the quality of life they give to my family and I. Could you please provide me with information of what areas and roads BLM is looking at closing in Nevada? Can you also explain what reasons are behind the closures?

ISSUE 21: CAVE AND KARST RESOURCES

No comments.

ISSUE 22: URBAN GROWTH

Table C-23
Urban Growth

Urban Interface
Wild Horse Data: Documentation of Herd population count/census numbers which includes a complete demographic breakdown of Wild Horses in each of the Herd Management Areas Number of Bands Stallions/Mares ratios, which should be at a more natural ratio of 50/50 Foals Yearling 3 Year Olds Scientific data should be included and show the impacts of sex ratio skewing on the social/behavioral dynamics of the Wild Herds Removal of fencing These Wild Herds must be allowed to follow their natural grazing/migration patterns, to the degree possible. They also must be allowed to intermingle in order to maintain a viable and robust gene pool. Predator protection This is the natural way of population control, and these Public Lands/Herd Management Areas are, after all, wildlife areas, and should remain as such. Prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PSP fertility control (if necessary) and protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues.
Recreation:The Carson City District (CCD) recreation program is very important to the densely populated areas in Western Nevada as well as to more rural areas. The RMP should address urban interface issues as more and more citizens take advantage of recreation on public lands, with the attendant impacts on wildlife habitat, fire and public safety, and other resources. Recreation permits should not be issued or should be revised to include seasonal restrictions to protect critical wildlife habitat areas or seasonal uses, such as Sage Grouse leks and nesting areas.
11. Regarding Issue 22 as identified on the issues webpage; Urban Growth Urban Growth is not well defined in BLM's materials. In addition, issues associated with Urban Growth will (or should be) be addressed by the issue Lands and Realty. Because "Urban Growth: is not sufficiently defined in BLM's materials, incorporating this issue as a Significant Planning Issue will require the agency to provide additional opportunity for public input in order to comply with mandates requiring meaningful public input when formulating land use plans.

Table C-23
Urban Growth

Since the construction of USA Parkway and the expansion of human encroachment into nearly every corner of the district - even the most remote or desolate - it stands to reason there will be more contact between wild horses and humans. Perhaps an increase in reflective silhouette signage along the more heavily used highways where wild horses tend to roam, and lighted 'crosswalks' on portions of highways known to be used by wild horses. Some form of media to educate and alert the public to the presence of wild horses along a particular route. Encourage the public to utilize plants in their landscapes which are both unappetizing to wild horses and desert-friendly. This could be a two-fold solution as water is a precious commodity – especially in outlying areas. And more emphasis should be placed on discouraging the public from leaving forage - specifically hay - for wild horses. This is dangerous for both people AND wild horses.
B. Being our back yard the urban Interface areas receive the heaviest use. g. With a few hours of free time we can enjoy quality time recreating. H. Trailheads are as close as the nearest dirt road.
We urge that the Carson City District prioritize range management tools in HMAs, including repair and enhancement of water resources, removal of fencing, PZP fertility control (if necessary) and the protection of predators (via cooperative agreements with wildlife agencies) to restore ecological balance. Range improvements, including those listed above, should be utilized to the greatest extent possible to address urban-interface issues. Cooperative agreements with local horse rescue and wild horse organizations should be included as a means to negate urban interface issues facing animals near human development areas.
Prior to urban sprawl/expansion of the City of Sparks, these BLM lands were used in various ways (e.g., cattle grazing; equestrian; OHV usage, including 4X4s, motocross, ATVs; hunting and shooting; dumping; and non-motorized OHV usage, including hiking and mountain biking). However, due to an increase in population, the development of neighborhood communities as part of the expansion of the City of Sparks (e.g., Wingfield Springs), and establishment of the Golden Eagle Regional Park, access to the adjacent BLM lands has improved. As a result of improved access to these public lands, an increase in recreational activities by the general public, there is an overall increase in usage of these BLM lands. As such, land usage by the different user groups is now producing conflict due to competing activities (e.g., shooters vs. hikers). With the expansion of Sparks City limits and urbanization of bordering lands, historical usage of the land (i.e., hunting/shooting) in combination with present day usage (i.e., hiking, mountain biking, general exploration) creates safety issues. These comments concern a call for BLM to address the user conflict and safety issues that exists and is increasing (i.e., shooters vs. non shooters), identification of the lands for recreational purposes, and protect open space near urban development. Specifically, the intent of these comments is to prompt the BLM to consider these lands in the current RMP update as a recreation corridor.
Buffer zones can be incorporated around the urban interface areas to reduce conflict.
b. Clean ups -sadly there is a lot of stuff dumped on BLM land. I must say that I have never seen a horseback rider, bicycle rider or OHV rider deliberately dump trash in the areas that I live in. I have caught people dragging a trailer out with trash/washers/dryers/frig and even the occasional car! i. Create a method for local organizations, citizens and clubs to give back to their community. Make it a quarterly event... perhaps promoted on billboards and local papers or go viral (facebook etc is almost free "Friends of the BLM")

ISSUE 23: FOREST/WOODLAND MANAGEMENT

Table C-24
Forest/Woodland Management

Foresty
Sagebrush manipulation/treatment is prohibited. Selective hand--cutting of conifers only in areas where they are shown to conflict with sage-- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration).
5) The forest resources and forest products need to be treated equally with other resources in the CCDO. A) Ensure that all users of forest resources are citizens of the United States. B) Reduce overburdening rules and simplify stipulations for the public that use forest resources. C) Maintain low permit fees and utilize the Free-Use regs in the CFR to offer forest products for free, when the products are not being used for profit. D) Make sure that all forest products are offered to both the general public and commercial users. The CCDO has a history of not offering forest products to commercial users (example: pine nuts) and this is totally unfair to the public. E) Many forested areas within the CCDO jurisdiction are in need of thinning (density management). Utilize the public to help thin this resource - encourage public participation versus discouraging them. F) Follow guidance in the Healthy Forest Restoration Act and Healthy Forest Initiative in the management of forest resources. G) Maintain Old Growth and follow Large Tree Retention guidelines in forested areas where treatments are planned/implemented. H) Reforest forested sites that are burned in wildfires.
7-d. ISSUE: The proposed Conservation Measures fail to address pinyon-juniper (woodland) encroachment into sagebrush / sage grouse habitat as an important issue needing specific recommendations for the Great Basin physiographic area which includes the CCDO. Woodland encroachment is one of the most intractable problems facing sage grouse habitat management in the Great Basin. There is an extensive body of research and research publications concerning the history of woodlands in this physiographic area and the Colorado Plateau. Climate / carbon cycle changes, interruption of natural fire cycles, changes in class of grazing livestock and historic recovery of fuel wood areas have all contributed to an increase in the stocking rate and acreage dominated by woodlands. Water source and understory vegetation losses due to encroaching woodland areas have been researched and documented for many years. Woodland encroachment into sage grouse nesting / brooding (riparian area) habitat and connective habitat continues to make these areas less than ideal or unusable for sage grouse. Although CCDO has programs for woodland management, treatment is expensive and fraught with regulation on larger areas. Treatment of larger areas is usually the only way to create a significant benefit for a species like sage grouse. Whithout specific management objectives in sagebrush / woodland interface areas, crucial sage grouse habitat will be lost.
FORESTRY: Timber and Woodland Management 8. ISSUE: Timber and woodland management has been piecemeal in the past on CCDO (fire program excluded) In the past, timber and woodland management has been done in a piecemeal fashion. Wildlife habitat hasn't been protected or maximized, products taken by woodland users hasn't been managed or maximized, non-forest product resources haven't been protected during extraction, possible one-time small scale commercial opportunities haven't been explored, landscape scale planning for woodland management (such as managing patch size and age class), pine nut demand vs sustainability, hasn't been done and timber extraction hasn't been done in a modern, regulated way. Bio-fuels projects have been reviewed for permitting without having any information on the structure / sustainability of the woodland resource for other users.

Table C-24
Forest/Woodland Management

Forestry and Woodland Resources: Pinyon-juniper (PJ) removal for either biomass or other commercial purposes or for "restoration" should be carefully evaluated because it can be especially damaging to PJ dependent bird species (See. NDOW Wildlife Action Plan and Nevada Partners in Flight Bird Conservation Plan). Old-growth PJ woodlands should not be labeled as senescent, degraded or in need of thinning and management, but conserved for PJ-dependent species and for traditional uses by Native American tribes in the CDD district. Areas in need of reduction of PJ could be designated as firewood areas.

ISSUE 24: GEOLOGY AND SOILS

Table C-25
Geology and Soils

Geology
Fossils a fragile non-renewable resource deserving responsible conservation The timestamps left by the paleontological resources in the management area, whether they be impressions of Jurassic ammonoidea, permineralized wood or bones from Pliocene fauna, have proven to be vital as biostratigraphic markers in unravelling the lithographic puzzle of the Basin and Range to Sierra Nevada transition zone. These resources are fragile and deserve conservation efforts, including the courage to relocate the Pinenut Common Use Area gravel pit and subject ongoing mineral resource extractions to the requirements of the National Environmental Policy Act. Circumventing good decision-making procedures by relying on decisions made in ignorance prior to the legislative demands is not responsible conservation.
Soils
These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large--scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage--grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross--country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA.

Table C-25
Geology and Soils

The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage--grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage--grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage--grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts.
c. Soil Erosion. Are there areas of accelerated soil erosion that is caused by horse trailing, or located in watering and grazing areas. An example is some of the erosion that has been caused by horses in the Dogskin HMA around the springs on the south side of Dogskin Mountain.
2. Because this area is the only priority-listed Mercury Superfund site in Nevada, the potential for health risks to residents and visitors from mercury contamination of old mill sites and tailing piles is significant. These health risks are still under investigation and evaluation by NDEP and EPA. Most of the contamination is from 1800s mining processing mills that used high-concentrations of arsenic, mercury, and lead. It is estimated that during the years they processed gold and silver in the subject areas, over 7,500 tons of mercury accumulated in the soils.
We specifically request that any future renewable energy development within the CCD address the following concerns: o Be consistent with the direction and intent of the Nevada Energy and Infrastructure Development Standards to Conserve Greater-Sage Grouse Populations and Their Habitats4 o Minimize the projects' ecological footprints; site renewable projects on previously disturbed lands; o Avoid steep slopes in order to reduce erosion impacts; o Avoid sensitive and rare natural communities; o Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors; o Require structures that discourage perching by raptors; o Avoid fly-ways, especially for raptors; o Avoid development of priority areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", State Priority Wetlands, regional conservation plans, recovery plan needs for threatened and endangered species, and Audubon IBAs; o Avoid impacts to species of plants and animals listed under the state administrative code and the ESA; o Avoid local, state, or federally protected lands; o Minimize growth-inducing impacts; o Be consistent with the conservation priorities of existing land management and conservation plans; o Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities; o Minimize cumulative impacts due to existing and planned development in the region; o Actively restore native vegetation to the project footprints after the infrastructure has been constructed. 4 http://ndow.org/wild/conservation/sg/resources/nevada_energy_standards_for_sage-grouse_2010.pdf

Table C-25
Geology and Soils

Seasons of Use No grazing will be allowed in sage-grouse habitat during lek and nesting periods. Thisperiod is March 1 through June 20 or later. This must be applied to all sagebrush habitats, and to protect nesting migratory birds as well, and pygmy rabbits with young in shallow natal burrows. These habitats must be fully identified as part of the current process. Every effort must be made to avoid grazing areas critical for brood rearing, as well. No grazing will be allowed in sage-grouse habitat during winter periods. This must be applied to all sagebrush habitats. These habitats must be fully identified as part of the current process. This protects birds from disturbance and displacement by livestock management activities. In all instances of avoidance, livestock use must not be shifted and intensified into other fragile sites or vegetation communities, or other rare species impacted.
Stocking must be properly applied so that these standards can be attained during every grazing disturbance episode. This all provides for protection of microbiotic crusts, a frontline defense against cheatgrass and other invasive species.
BLM must also apply an upland trampling standard to limit disturbance to soils, microbiotic crusts, and native plants including seedlings. This must require that less than 5% of the area of a square meter monitored at representative typically grazed sites across the pasture is trampled. No areas of the allotment, including those receiving the most intensive use, should be allowed to receive greater than 10% of the surface area being trampled. Ranchers have horses and herders, and concentrations of livestock cannot be allowed. These disturbed sites create epicenters of disturbance where weed invasion, and then outward spread due to chronic livestock disturbance occurs.
· Soil Compaction and Accelerated Erosion (Fleischner, 1994) (Belsky, Matzke, Uselman, 1999) (Donahue, 1999) (Wuerthner, Matteson, 2002)

ISSUE 25: DROUGHT MANAGEMENT/CLIMATE CHANGE

Table C-26
Drought Management/Climate Change

Impacts of global warming have been predicted with a high degree of both certainty and precision, providing the BLM with more than adequate information to analyze and disclose the carbon footprint of the proposed action and its contribution to global warming and the likely impacts on resources including air quality, water availability, and to imperiled plants and animals. In a Ninth Circuit case, Center for Biological Diversity v. National Highway Traffic Safety Administration, 508 F.3d 508, 555 (9th Cir. 2007), involving an NHTSA rule for corporate average fuel economy standards for light trucks, the court found that climate change satisfied several of the "intensity" factors in 40 C.F.R. § 5108.27(b). First, the court found that although the NHTSA rule at issue may have an "individually insignificant" effect on climate change, it may nonetheless have a "cumulatively significant" impact, thereby satisfying 40 C.F.R. § 1508.27(b)(7). In addition, the court found that climate change will affect public health and safety, satisfying 40 C.F.R. § 1508.27(b)(2).

Table C-26
Drought Management/Climate Change

The World Health Organization has estimated that as of the year 2000, 154,000 deaths and the loss of 5.5 million daily adjusted life years per year worldwide were already attributable to global warming.18

The Scientific Assessment of the Effects of Global Change on the United States devotes an entire chapter on the significant impacts of climate change on human health. The impacts can be characterized as stemming from: temperature effects; extreme events such as storms, wildfires and droughts; climate-sensitive infectious diseases; aeroallergens (pollens); and, reduced air quality.19

17 78 Fed. Reg., 18893-18894, 18901-18902.
18 World Health Organization, 2002. The World Health Report 2002, from http://www.who.int/whr/2002/en/index.html .
19 Scientific Assessment of the Effects of Global Change on the United States, May, 2008. A Report of the Committee on Environment and Natural Resources, National Science and Technology Council, pp. 167-183. Available at: www.climatescience.gov/Library/scientific-assessment/Scientific-AssessmentFINAL.pdf .

What is missing from BLM scoping information on the CCD RMP is any mention of the evaluation of the effects of current and future climate change on BLM lands, resources, and programs, despite the Department of Interior's mandates (http://www.doi.gov/whatwedo/climate/strategy/index.cfm) and the September 14, 2009 Secretarial Order No. 3289 to address the impacts of climate change on America's water, land, and other natural and cultural resources. Please include this in the CCD RMP.

What criteria should be used to make habitat and populaon suitability and viability determinaons?
Scientific research that is fully vetted that includes the study of impact of all large animals utilizing the land (cattle). An additional comment: studies of African wildlife populations and the effects of drought and cattle raising shows that habitat goes through big temporary changes, some of which do not look attractive. Bounceback should be the important factor.

Table C-26
Drought Management/Climate Change

8. The RMP EIS Must ADEQUATELY ANALYZE AND DISCLOSE THE IMPACTS OF THE PROPOSAL WITH REGARDS TO CLIMATE CHANGE
The warming of our climate system is unequivocal.10 11 12 There have been significant increases in global average air and ocean temperatures, widespread melting of snow and ice, and rising global average sea level. Eleven of the past twelve years rank among the warmest in the instrumental record of global surface temperature, and it is likely that average temperatures in the Northern Hemisphere have been the highest in at least the past 1,300 years. Satellite data since 1978 show that Arctic sea ice is shrinking at a rate of 2.1-3.3% per decade, with even larger declines in summer sea ice.13 The National Snow and Ice Data Center ("NSIDC") reports that in 2006, Arctic ice had diminished to its all time lowest recorded level. They further report that sea ice extent averaged over the month of March 2009 was 5.85 million square miles. This was 282,000 square miles above the record low of 2006, but 228,000 square miles below the 1979 to 2000 average. Air temperatures over the Arctic Ocean were an average of 1.8 to 3.6 degrees Fahrenheit above normal, and sea ice older than two-years reached record lows.14 15 In April 2009, the Wilkins Ice Shelf destabilized and collapsed, leading researchers to state that, "There is little doubt that these changes are the result of atmospheric warming on the Antarctic Peninsula, which had been the most rapid in the Southern Hemisphere".16

10 Climate Change 2007: Synthesis Report – Summary for Policymakers, International Panel on Climate Change, page 2.
11 Technical Report Document for Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act. Climate Change Division, Office of Atmospheric Programs, U.S. Environmental Protection Agency, Washington, D.C. April 17, 2009, page ES-2.
12 Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 2023(a) of the Clean Air Act; Proposed Rule. 78 Fed. Reg., 18896 (April 24, 2009).
13 Climate Change 2007, page 2.
14 Arctic sea ice younger, thinner as melt season begins, April 6, 2009, from http://www.nsidc.org/arcticseaicenews/ (last accessed April 30, 2009).
15 J. Richter-Menge et al, 2008. Arctic Report Card 2008, Sea Ice, from http://www.arctic.noaa.gov/reportcard/seaice.html (last accessed April 30, 2009).
16 European Space Agency, April 29, 2009. Satellite imagery shows fragile Wilkins Ice Shelf destabilized. Science Daily. Retrieved April 30, 2009, from http://www.sciencedaily.com/releases/2009/04/090428154833.htm .

The inescapable fact is that global warming and climate change now presents a dire situation for life on Earth, and as a major emitter of GHGs, the United States must act quickly and deliberately, using any and all the tools at its disposal to eliminate or reduce the dangers to human health and the environment.

In its Endangerment and Cause or Contribute Findings, the EPA has explicitly acknowledged that climate change resulting from elevated GHG levels would result in human health risks such as heat-related mortality, exacerbated air quality, aggravated risks for respiratory infection, aggravation of asthma, and potential premature death for people in susceptible groups.17

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Drought Management/Climate Change

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The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock--associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology.

Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage--grouse habitats of the ACEC.

Table C-26
Drought Management/Climate Change

The BLM cannot ignore the gravity of the threat of climate change to life within the planning area, and not take a hard look at the impacts. Federal agencies' mandatory duty to take a hard look at the ongoing impacts of global warming in NEPA documents has been affirmed by the courts. As the Ninth Circuit has recognized: Global warming has already affected plants, animals, and ecosystems around the world. Some scientists predict that 'on the basis of mid-range climate-warming scenarios for 2050, that 15-37% of species in our sample of regions and taxa will be 'committed to extinction." In addition, there will be serious consequences for human health, including the spread of infectious and respiratory diseases, if worldwide emissions continue on current trajectories. Sea level rise and increased ocean temperatures are also associated with increasing weather variability and heightened intensity of storms such as hurricanes. Past projections have under-estimated sea level rise. Several studies also show that climate change may be non-linear, meaning that there are positive feedback mechanisms that may push global warming past a dangerous threshold (the 'tipping point'). See CBD v. NHTSA, 538 F.3d at 1190-91 (citations omitted).
Global warming's well-established impacts on resources including air quality, water quality, and imperiled plants and animals will combine with and exacerbate the direct, indirect, and cumulative impacts of management actions and land use activities such as motorized recreation. At a minimum, a description of the effects of climate change on existing conditions such as the prevalence of exotic plant species, important habitat for wildlife and habitat connectivity, the availability of water and the health of riparian areas, zones of soil erosion or vulnerability to erosion, all provide critical baseline information necessary for the BLM to determine whether public land resources can withstand any of the proposed management alternatives. Without this basic foundational information about the existing impacts of climate change on the land, and future expected impacts, it is impossible to make informed decisions about the level, location, and kind of activities the land and its ecosystems can support in the future.
Global Climate Change While it is a difficult topic to address in a planning document, we hope that careful consideration will be give to the impacts of increasing temperatures in this extremely arid state of Nevada.
The impacts to species and biological diversity are likewise severe. In a study published in Nature in 2003, Parmesan and Yohe reported a "globally coherent fingerprint of climate change impacts across natural systems." 20 In documenting this "fingerprint" of global warming on ecosystems, scientists have predicted three categories of measurable impacts from recent warming: (1) earlier timing of spring events and later autumn events (i.e., changes in "phenology"), (2) extension of species' range poleward or upward in elevation, and (3) a decline in species adapted to cold temperatures and an increase in species adapted to warm temperatures. 21 Of local concern, are impacts to the sage grouse, desert fish, and low elevation plants or plants with narrow environmental constraints. 20 Parmesan, C. and G. Yohe. 2003. A Globally Coherent Fingerprint of Climate Change Impacts Across natural Systems. Nature 421:37-42. 21 Parmesan, C. and G. Hector. 2004. Observed Impacts of Global Climate Change in the U.S. Prepared for the Pew Center on Global Climate Change.

Table C-26
Drought Management/Climate Change

Several recent reports 22, from high ranking U.S. science groups made the following factual findings regarding the social and environmental impacts resulting from increased GHG emissions and climate change:

• "[A] severe drought has affected the southwestern United States from 1999 through 2009";
• "Human-induced climate change appears to be well underway in the Southwest." (Includes California and Nevada;
• "The annual peak of streamflow in snowmelt-dominated western mountains is now generally occurring at least a week earlier than in the middle of the 20th century. Winter stream flow is increasing in basins with seasonal snow cover. The fraction of annual precipitation falling as rain (rather than snow) increased in the last half century";
• "Most climate models project an increase in winter precipitation in the northern tier of states and a decrease in portions of the Southwest during the 21st century";
• "The snow-covered area of North America increased in the November to January season from 1915 to 2004 due to increases in precipitation. However, spring snow cover in mountainous regions of the western United States generally decreased during the latter half of the 20th century. The IPCC determined that this latter trend is very likely due to long-term warming...";
• "In the last three decades, the wildfire season in the western United States has lengthened and burn durations have increased. Climate change has also very likely increased the size "associated decrements to air quality and pulmonary effects, are likely to increase in frequency, severity, distribution, and duration in the Southeast, the Intermountain West and the West";
• "The forested area burned in the western United States from 1987 to 2003 is 6.7 times the area burned from 1970 to 1986 (Westerling et al., 2006)";
•"Wildfires pose significant direct health threats. They can also have substantial effects through- increased eye and respiratory illnesses due to fire-related air pollution and mental health impacts from evacuations, lost property, and damage to resources" and "associated decrements to air quality and pulmonary effects, are likely to increase in frequency, severity, distribution, and duration in the Southeast, the Intermountain West and the West";
• "Conditions observed in recent years can serve as indicators for future change. For example, temperature increases have made the current drought in the region (Southwest) more severe than the natural droughts of the last several centuries. As a result, about 4,600 square miles of pinon-juniper woodland in the Four Corners region of the Southwest have experienced substantial die-off of pinon pine trees".
• "Another example of the ecological consequences of climate change involving Insects and affecting adaptability is the devastation of millions of acres of western U.S. and Canadian pines by bark beetles during the warmth and drought of 2000 to 2004. Recent modeling and observations revealed that beetles invading the northernmost lodgepole pine trees are now only a few miles from previously pristine jack pine populations (Logan and Powell, 2007). This may create a direct pathway of invasion to valued pine forests in the eastern United States and Canada";
• "Climate-fire dynamics will also be affected by changes in distribution of Ecosystems across the Southwest. Increasing temperatures and shifting precipitation patterns will drive declines in high-elevation ecosystems such as alpine forests and tundra. Under high emissions scenarios, high-elevation forests in California, are projected to decline by 60 to 90 percent before the end of the century";
• "In California, two-thirds of the more than 5,500 native plant species are projected to experience range reductions up to 80 percent before the end of this century under current projected warming";
• "As the climate warms, stream temperatures are likely to increase, with effects on Aquatic ecosystems. There is some evidence that temp

ISSUE 26: PUBLIC HEALTH AND SAFETY

Table C-27
Public Health and Safety

It is long over due for sand mt NV to have a safe way to race the hill. Sand Mt has a long tradition of lawlessness behavior rooted around lack of education and alcohol at the race hill making it a place few want to visit anymore.
The PLF prepared a position statement, "Recreational Shooting on BLM Public Lands," dated August 17, 2010. Our position is that the BLM Land Use Planning Process should identify potential shooting ranges or other areas of public land where concentrated recreational shooting activities are currently occurring and where such activities might be directed in the future. Recreational shooting on public lands should be restricted or prohibited by land management decisions only in public land areas where dangers to public safety exist or where restrictions or prohibitions on recreational shooting are needed to prevent damage to valuable resources. That position statement is attached for reference.
Conflicts in Urban Areas We recommend that BLM explore safe and effective methods to mitigate vehicle collisions with wild horses and burros rather than rounding up and removing them. Streiter-Lites have reduced nighttime deer/auto collisions by 78-90%. The cost is minimal at $10-15 thousand dollars per mile. This includes installation, labor, and parts, and is far cheaper than roundups and subsequent holding. This technology would pay for itself quickly as most collisions would be avoided. Coupled with proper signage along roads where collisions have occurred in the past, accidents could be eliminated in the future. This would have been far cheaper than the "nuisance" roundup of burros in the Bullfrog HMA earlier this year. Under the Federal Highway Administration's Highway Safety Improvement Programs 90% funding is available, another cost savings to BLM, particularly if local and state government agencies apply for this funding.
The situation regarding surface mining on the Comstock is fraught with complexity, but one bedrock fact seems clear: this ground was poisoned with mercury. No-one knows exactly where it is, but anecdotally it is in American Creek and other places the local kids play. And no-one knows how much is out there, although it is thought that some 7,500 tons of mercury accumulated in the soils of the Carson River Mercury Superfund site, along with unknown quantities of arsecic and lead. But we do know that disturbing in the dirt as CMI is now so busily doing is what makes these toxins so damaging to human health. Left alone they do no harm so long as they stay out of the waterways. But once dispersed into the air, these substances move with the wind and settle into our homes and our waterways -- and onto the steaks we're grilling in the back yard.

Table C-27
Public Health and Safety

How should BLM address wild horse and burro urban-interface issues?

How about considering CUMULATIVE use in the area when using 2,4-D? Consider this:

The EPA says that 2,4-D is seventh largest source of dioxin in the U.S.

Dioxin DCDD that contaminates 2,4-D herbicide is not tested, measured or monitored by the EPA, or even regulated. A Canadian research paper states that dioxin DCDD may have large public health implications due to its prevalence in our food and environment.

DCDD is one of the hundreds of kinds of dioxin - (TCDD is the worst, but DCDD may be equi-potent):

http://group.bmj.com/docs/pdf/8_3_s10.pdf
"2,4-D is contaminated with an unmonitored form of dioxin, 2,7-dichlorodibenzo-p-dioxin (2,7-DCDD)...There is very little research on this form of dioxin, but in 1986 2,7-DCDD was found to be "equipotent" to the very toxic 2,3,7,8-TCDD in a test of immunosuppression. Given the wide use of herbicides that are contaminated with 2,7-DCDD there may be large public health implications of this contamination of our food and environment."
The BLM needs to do an aggregate risk assessment considering exposures to humans, animals, water, drinking water, plants from COMBINED SOURCES in the area. BLM should do Drinking Water Level of Concern (DWLOC) testing and use the Forward Calculation Approach to include in an EIS when planning to use 2,4-D.

According to the Environmental Protection Agency (EPA) 2,4D:

Exposure to 2,4-D has been reported to result in blood, liver, and kidney toxicity (1, 2, 4). Chronic oral exposure in experimental animals have resulted in adverse effects on the eye, thyroid, kidney, adrenals, and ovaries/testes (1). Experimental animal studies have demonstrated delayed neurobehavioral development and changes in neurotransmitter concentrations in offspring exposed during pregnancy or lactation (5-9).

Low concentrations of 2,4-D have been found in groundwater in some states. Agricultural run-off containing 2,4-D may contaminate groundwater in some areas.

Experimental animal studies of chronic oral exposure have reported adverse effects on the eye, thyroid, kidney, adrenals, adrenals, and ovaries/testes (1). In addition, some experimental animal studies have reported teratogenic effects (birth defects) at high doses, including increased fetal death, urinary tract malformation, and extra ribs (15, 16). When adult female experimental animals were exposed to 2,4-D during their pregnancy and lactation periods, their exposed offspring exhibited neurological effects, including delayed neurobehavioral development (5) and changes in several neurotransmitter levels or binding activities (6-9, 17) and ganglioside levels (18, 19) in the brain. Delayed neurobehavioral development was manifested as delays in acquisition of certain motor skills such as the righting reflex (5).

Table C-27
Public Health and Safety

Prior to urban sprawl/expansion of the City of Sparks, these BLM lands were used in various ways (e.g., cattle grazing; equestrian; OHV usage, including 4X4s, motocross, ATVs; hunting and shooting; dumping; and non-motorized OHV usage, including hiking and mountain biking). However, due to an increase in population, the development of neighborhood communities as part of the expansion of the City of Sparks (e.g., Wingfield Springs), and establishment of the Golden Eagle Regional Park, access to the adjacent BLM lands has improved. As a result of improved access to these public lands, an increase in recreational activities by the general public, there is an overall increase in usage of these BLM lands. As such, land usage by the different user groups is now producing conflict due to competing activities (e.g., shooters vs. hikers). With the expansion of Sparks City limits and urbanization of bordering lands, historical usage of the land (i.e., hunting/shooting) in combination with present day usage (i.e., hiking, mountain biking, general exploration) creates safety issues. These comments concern a call for BLM to address the user conflict and safety issues that exists and is increasing (i.e., shooters vs. non shooters), identification of the lands for recreational purposes, and protect open space near urban development. Specifically, the intent of these comments is to prompt the BLM to consider these lands in the current RMP update as a recreation corridor.
I also want the RMP process to give clubs and organizations put together cleanups and trail maintenance. There also needs to be a process to install new trails. I grew up riding with my family since I was 3 years old and I believe that responsible recreation helps keep families together and close, keeps children out of trouble, and increases the activity of kids, which helps with the United States issues with Obesity. I am trusting the BLM will use this process to improve recreation and recreation permits and not to close the riding areas.
It's not that we look down on the services of mining industry or miners, it is just not appropriate in a Superfund site where airborne mercury could be carried on the wind, caused by the ever-present dust of mining and mining exploration. And it's not appropriate in one of America's largest historic districts, and certainly not in a historic town with National Landmark status. The Comstock and surrounding BLM lands should be off limits to any disturbance that is damaging to our national reputation, that does not fit with our historic character and mission, and that poses serious risks to our health.
2. Because this area is the only priority-listed Mercury Superfund site in Nevada, the potential for health risks to residents and visitors from mercury contamination of old mill sites and tailing piles is significant. These health risks are still under investigation and evaluation by NDEP and EPA. Most of the contamination is from 1800s mining processing mills that used high-concentrations of arsenic, mercury, and lead. It is estimated that during the years they processed gold and silver in the subject areas, over 7,500 tons of mercury accumulated in the soils.
b. Clean ups -sadly there is a lot of stuff dumped on BLM land. I must say that I have never seen a horseback rider, bicycle rider or OHV rider deliberately dump trash in the areas that I live in. I have caught people dragging a trailer out with trash/washers/dryers/frig and even the occasional car! i. Create a method for local organizations, citizens and clubs to give back to their community. Make it a quarterly event... perhaps promoted on billboards and local papers or go viral (facebook etc is almost free "Friends of the BLM")

ISSUE 27: OTHER RESOURCE CONCERNS

Table C-28
Other Resource Concerns

Ownership of all public lands will be retained.
1) The amount of garbage, trash, beer cans/bottles, old cars, old couches, shot up TV's/computers, etc. that I come across really annoys me. I collect all I can when on the ATV and have yet to catch any of these litterers. More signs need to be posted, with heavy fines stated, and more BLM/Police Department involvement. Signs need to be posted where the pavement hits the dirt on all roads into the Pine Nuts and especially by the dump. The local police, who are good at collecting revenue from innocent people going 2 miles over the speed limit or rolling through a stop sign, need to spend more of their time in the Pine Nuts catching these litterers and fining them $500 to $1000 each plus mandatory clean-up. This would put an end to the littering. The dump located at the Pine Nut Road needs better containment of wind driven garbage. I have ridden by there on windy days and have seen 1000's of plastic bags blown all over the hills along Pine Nut Road next to the dump. Spring clean-up, bin donations from the Refuse/Dump center, and local involvement will all help to clean up the Pine Nuts.
Resources make hands-on education possible I teach at a private, non-institutional school based in the Carson Valley area of Nevada. Some of the programs and areas of study in our school include the use of resources in the area affected by the management plan. The land and resources are vital to our students' education and our school's curriculum in science. Specifically, within the nearby Pinenut Mountain area, our students are participating in activities of stream-following, learning to understand the water cycle and about erosion. We're studying topics in geology and geomorphology ranging from the forms of sedimentary rock and alluvial depsosits to volcanism, plate tectonics, geological time, and the orogeny of the Basin and Range and Sierra Nevada batholiths including the Pinenut mountains and the resulting metamorphism of sedimentary and igneous rocks. The resources available in the management area make possible research and learning in such a broad range of topics from lichens and pedogensis, soil sciences, and erosion, to wildlife, ornithology, the study of the area's diverse raptor, rodent and reptile populations, and even the archaeological remnants of Nevada's recent history through the 19th and 20th centuries. Besides this, in the last year our students participated in birding activities and the Audubon Society's annual Christmas bird count in the Ruhenstroth and Fish Springs areas. We also hosted several star parties with evenings of observations and discussion of astronomy from dark sites within the Ruhenstroth and Pine Nut mountains areas as well as in other nearby public lands in the Toiyabe National Forest. We conduct frequent field days and numerous overnight field trips throughout the year. The habitat and sites within the managed area are important to ongoing activities and those planned for future dates.