

**Overland Pass Habitat Improvement Project
Environmental Assessment Public Scoping Comment Matrix**

Name	Agency or Affiliation	Comment
Harvey Barnes	Member of the Public	There certainly is a need to reduce woody species in this area. I also suggest grass species to be seeded into bare ground areas in highly juniper infested areas. Methods to be used should be broadcast or, where feasible, drilled with a grass mixture of crested wheat, Sherman big blue grass, great basin wildrye, etc. Species used should be those that will root and grow to give competition to weed infestation, and that will readily germinate in the moisture availability and the soils there.
		The feral horse problem existing in that location was mentioned in the issues section. I know it's controversial at the least, but they should, at a minimum, be reduced to HML. If not, the habitat improvement efforts will not materialize, and financial expenditures and planning will be wasted.
Robert Dickenson	Moorman Ranch	Cattlemen and ranchers have been working to improve the habitat for livestock and wildlife for as long as there have been ranchers and cows in the west. If there is a future for continued use of the land by wildlife and domestic species, land use should be shared by all. Ranchers have learned to live with increasing numbers of wildlife: ranchers share their water, private land, and even sometimes ranch hay with wildlife, but many other outside groups oppose ranchers' conducting improvements to the public ranges. The future of ranching in Nevada certainly depends on the ability of the rancher to increase productivity. This is taxpayer's money that is used for a single use. Therefore, increasing forage production should be shared by all users of public rangeland.
		My objection to this range improvement would be that the benefits do not include all uses to public land users. Left out are all domestic livestock, and also wild horses.
Maurice Frank-Churchill	Duckwater Shoshone Tribe	The Tribe's initial concerns are cultural sites, given that the habitat improvement project is in close proximity of Fort Ruby and also the place where the 1863 Ruby Valley Treaty was signed. The Tribe's concern is the cumulative effect to these two sites, which are in very close proximity of each other. The Tribe's recommendation is also to have tribal monitors/observers, hired by the archeological firm, that may have to do mitigation to the proposed areas.
		It's been a while since the Tribe has visited the site; another field visit is requested to re-acquaint with the proposed projects.
Fred Leeds	Member of the Public	All the property within the project boundary is not government property.

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Mark Lowrie	Member of the Public	My main concern or issue is that I recommend careful planning and implementation of the prescribed fire portion of this project. I have been monitoring post fire recovery on many fires over the years where an abundance of thick cheatgrass, as well as other invasive annuals, has come in. It is very difficult to seed fires to get desirable vegetation to compete with cheatgrass or other invasive annuals. I know it is good to maintain an active prescribed fire program in the district. However, I would like to see the prescribed fire acres kept to a minimum, avoidance of burning south facing slopes, and the fire area chosen based on the least risk of invasive annuals establishing following the burn. That means selecting a prescribed burn area where the native vegetative component is excellent and resilient.
Paula Roth	Member of the Public	Her concern was off road travel from the public once the treatments are completed. She said the public have been driving all over the Chrome Fire area collecting firewood, and have created numerous roads. Paula did not want the same to occur with the Overland Project. I told her we had discussed that as an issue during our scoping meetings, and we would attempt to come up with a solution to address the issue. She would prefer that the project not proceed, because it could increase traffic in the treated areas and create additional two-track routes.
Skip Canfield	Nevada State Clearinghouse	Speaking for the State Land Use Planning Agency, I support your efforts on the Overland Pass Habitat Improvement Project.
Rebecca Lynn Palmer	State Historic Preservation Officer	Proposal supported. The Bureau of Land Management has indicated that they would like to execute Programmatic Agreement for this undertaking. If that is still the case, the public should be notified that they can comment on the Programmatic Agreement or the effect of the undertaking on cultural resources, and the draft document should be included with the Environmental Assessment, and should be provided to the public for comment.
Katie Fite	Western Watersheds Project	It is critical that an Environmental Impact Statement be prepared to examine all direct, indirect and cumulative impacts of this sprawling, very expensive project, as well as the serious adverse footprint of livestock grazing degradation across this landscape.
		Western Watersheds Project is very concerned that the project will result in the ultimate hazardous fuel, cheatgrass, proliferating.
		Could you please provide a map with sufficient detail to understand the attributes of the area?
		The schedule of proposed actions did mention that it is linked to Ely BLM projects. Ely has conducted massive deforestation and sagebrush eradication treatments that have had serious adverse impacts on sage-grouse, pinyon jay, ferruginous hawk, and many other rare species habitats.
		Full baseline biological inventories must be conducted in the appropriate seasons of year across the project area for all important and sensitive species.
		Full costs of this project must be provided.

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		<p>It is a great concern that a major source of funding for these projects is Southern Nevada Public Land Management Act, or other funds that are supposed to be used for conservation purposes, but instead are being used by Ely BLM to destroy native vegetation, spawn cheatgrass, and promote livestock forage grass. The Overland Project is in the very same vein. Is any squandering of Southern Nevada Public Land Management Act funds involved in Overland?</p>
		<p>We are strongly opposed to mastication, chaining, or use of fire here. Fire will cause a proliferation of cheatgrass – and this will be an irreversible impact. Full baseline info must be provided on soils, microbiotic crusts, stand structure, age class, disturbance history, mining era deforestation, etc.</p>
		<p>Are there road-less areas in or near this site? Existing or foreseeable mining claims or development? Energy or oil and gas? How will deforestation increase ease of exploration?</p>
		<p>Does domestic cattle or sheep grazing occur here? If so, we are greatly concerned about adverse impacts to “treated” sites. Full detailed analysis of grazing impacts and standards applied must be provided and data on actual use, conflicts with wildlife, monitoring data, etc. must be provided for the past 20 years.</p>
		<p>We are very concerned that the relentless purposeful Nevada agency deforestation that is underway across this region will have adverse impacts on local climate as forests moderate site conditions, slow wind, and help capture and retain snowpack. Destroying large areas of trees (and sage as will inevitably happen with aggressive mechanical or other large-scale treatments) will result in further desertification of these lands that are also suffering very significant current adverse effects from climate change.</p>
		<p>The Scoping letter lacks essential information necessary to understand the site-specific impacts of such an immense project. It should be re-scoped under an Environmental Impact Statement with much more information. The agencies must identify all important and sensitive species occurrences and habitat conditions upfront -in a comprehensive manner, as part of an Environmental Impact Statement process survey baseline. For example, the letter states that it provides sage-grouse nesting, summer, and winter habitat, and crucial summer, winter, and transitional mule deer habitat, and pronghorn habitat. Yet these areas are not identified, and the degree and severity of habitat fragmentation and degradation for all sensitive species is not addressed. Nor is the degree and severity of watershed degradation, including drainage networks and riparian areas.</p>
		<p>The status of the local and regional population of sage-grouse, pygmy rabbit, migratory birds, etc., and the full battery of threats these habitats and populations face must be examined. What is the current ecological condition of these important seasonal ranges and other wildlife habitat and what impacts are the very large herds of domestic sheep and cattle grazed in this landscape having on the habitats, and the viability of populations? How can reducing or removing the stress of livestock grazing improve ecological conditions?</p>

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		Please provide detailed mapping and analysis of the current degree of cheatgrass and other invasive species in all portions of the project area. Western Watersheds has observed mats of cheatgrass infesting existing treatment areas in the chronically grazed southern Ruby Mountain area. Ely BLM treatments are spawning cheatgrass across the District from Cherry Creek to Hamlin Valley to Lake Valley to Cave Valley to North Antelope. It is as if the current District management is seeking to turn the Great Basin into a cheatgrass wasteland by destroying sage and pinyon juniper so that no one cares about it.
		How is water quality and quantity already jeopardized and impacted by grazing, treatments, livestock projects, mining, etc.?
		Please provide detailed mapping of all existing livestock facilities, and identify projects for removal to reduce the adverse impacts of grazing disturbance.
		Western Watersheds Project is alarmed at the damage being done to a series of critical sagebrush and pinyon-juniper habitats by the BLM's "fuels" projects in this region– that destroy sagebrush and PJ in order to grow grass for cows and sheep. All kinds of excuses – "fuels", "sage-grouse"- are given, but the reality is they are the very same harmful projects that caused many ecological problems, including sage-grouse declines, when implemented previously.
		Increasingly the grass that is resulting is cheatgrass, and it is impossible to control once it invades large areas of land.
		The current project area where vegetation is proposed to be crushed, mowed, burned, poisoned and otherwise destroyed includes sites named Willow Creek, Walker Canyon, North Cherry, Big Wash, Cracker Johnson, Overland Pass, Lower East Bench, East Bench, and Sherman. This is a huge and sprawling land area, often surrounded by other highly degraded lands. There is a great lack of site-specific information on soils, microbiotic crusts, stand composition, mature and old growth vegetation, presence of invasive species, risk of invasive species, degree and severity of livestock degradation, etc. across this project area.
		The BLM and the Forest Service scheme to spend millions of dollars (what is the cost of this exactly?) to destroy this vegetation to promote livestock forage; they turn a blind eye to the areas of significant cheatgrass infestation and the sterile and highly degraded crested wheatgrass seedings in the region, as well.
		To what extent is clearing this vegetation aimed at easing mine exploration or other development? Where are all mine claims, oil and gas leases, geothermal leases, etc. in and surrounding the area? How is aquifer drawdown from the Bald Mountain Mine expected to impact ground and surface waters? What is the current degree of aquifer drawdown, and how will it be increased? How will deforestation , and the very likely invasion of cheatgrass, promote further desertification of these public lands and waters? What are the ecological conditions in all watersheds, conditions of riparian areas, etc.? Please provide all livestock use information and all livestock monitoring information for all allotments for the past 20 years. What are all current flow rates at all springs, and how has or will mining aquifer drawdown impact them?

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		Isn't Ely BLM in the process of producing one of its cookie cutter massive watershed sage and pinyon juniper destruction Environmental Assessments just to the south in the Newark and Huntington Valleys? These are based on woefully outdated and deficient information on ecological conditions, and the science of sagebrush and PJ and other wild land ecosystems. How will all of this amplify the full range of adverse cumulative impacts of the large-scale mining?
		Scoping is based on same old failed destructive "treatments" that cost a fortune and produce minimal benefits while promoting weeds.
		The aggressive ground-disturbing and/or chemical poisoning methods agencies are proposing are often of little to no value to sage-grouse, and in fact are downright harmful – aggressive removal of woody vegetation typically injures or kills all or most sage present on a site.
		Selective hand cutting of pinyon juniper in areas that may actually be useful to sage-grouse must be fully considered as a viable alternative. This will also give people jobs. Material should be left unburned on site to increase moisture-holding capacity.
		BLM and Forest Service in Nevada have never figured out how to actually restore a single acre of cheatgrass-infested lands (witness the endless Izzenhod and other projects) yet keep churning out these projects that serve to promote even more cheatgrass, and in reality do little to no good for anything other than contractors who reap large sums for destroying native woody vegetation with huge bulldozers and herbicide.
		We are alarmed at the weed infestations occurring across the Ely District and many Forest lands treatments, and request a moratorium on all heavy equipment and herbicide projects until a full accounting of the damage already done can be undertaken.
		The outcome of any treatment and vegetation responses are highly uncertain due to the increasing stress from climate change, drought, etc.
		FRCC and other fuels-modeling used to justify this type of project are typically based on wildly incorrect fire return intervals and other erroneous information. Western Watersheds provided literature.
		The only information that is provided in Scoping is a small map, and list of a battery of highly destructive methods to destroy microbiotic crusts and native vegetation communities. This will create openings in plant communities that are very likely to be colonized by flammable cheatgrass and other invasive species.
		Please review the United States Department of the Interior's General Land Office Historical Survey records. When these records are present from the period before intensive mining deforestation (which also must be factored in here in trying to understand historical disturbance schemes), they provide vital information in understanding historical disturbance regimes. Where in these lands or surrounding areas, are these records available before prolonged mining disturbance? What do they show in relation to the natural extent of PJ vs. sagebrush vegetation?

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		Flawed and erroneous intervals are often used in NRCS soils models and information; they appear to be aimed at maximizing livestock forage grass at the expense of native woody vegetation. The "idealized" and modeled communities have minimal land with sparse woody vegetation cover which does not appear to be the natural condition. See Bukowski and Baker 2013 for example, describing historically dense big sagebrush across Idaho, Oregon, Nevada, Utah.
		Please provide detailed analysis of the naturally occurring climax plant species and vegetation zonation in this area of the Great Basin.
		Agencies should avoid all treatments in areas with pygmy rabbits – instead of destroying sage, please strive to re-connect habitats by planting sagebrush. Western Watersheds provided literature discussing treatment within big sagebrush and pygmy rabbit habitat.
		Mature and old growth vegetation provides the critical habitat feature upon which a host of native species rely. Full and detailed analysis of species’ needs, threats, habitat losses - including in recent fires or due to climate change and insects disease, such as collapsing Clark-s Nutcracker populations - must be fully examined. Nutcrackers also eat pine nuts, and destruction of PJ further endangers this species, now a federal candidate.
		Western Watershed provided literature regarding migratory birds including sage thrasher, sage sparrow, and Brewer’s sparrow.
		Western Watersheds provided literature regarding exotic and native plants.
		Western Watersheds provided literature regarding weed treatments.
		We oppose BLM efforts to seed crested wheatgrass and cultivars of pseudo-natives as livestock forage, and seedings are prone to failure. Instead, BLM should consider an alternative to remove livestock grazing degradation, and to identify the many sterile and harmful existing crested wheatgrass seedings – such as those on the western Ruby Mountain fans – for replanting with sagebrush.
		Western Watersheds provided literature regarding mowing and fire on sage-grouse habitat.
		WWP site observations in Ely BLM large-scale zones of sage and sage-PJ destruction in NV have found that Tebuthiuron poisoning promotes large-scale invasion of cheatgrass into sites that previously had little cheatgrass – catapulting the advance of this hazardous fuel forward. WWP observations of sagebrush mowing/crushing projects show that in areas that previously had little cheatgrass this too often promotes a profusion of cheatgrass.
		Use of prescribed fire is particularly risky as well, especially with the atmosphere of treatment-mania that surrounds treatment activities in the Ely area. See North Schell Escaped Prescribed Fire report.
		Western Watersheds provided literature regarding treatments of PJ and sagebrush.
		Invasive species, an ever-growing concern in the face of climate change, coupled with chronic livestock grazing disturbance impacts, is exacerbating cheatgrass.

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		Western Watersheds provided literature regarding weeds and sagebrush control or removal projects.
		WWP notes that at the time of the Warranted But Precluded Finding in 2010, BLM had told FWS it was not really doing sagebrush destruction projects. Nothing can be further from the truth – especially in Nevada Ely BLM lands, and where a huge number of projects have already been conducted, authorized, and/or are proposed. A full and comprehensive cumulative effects analysis of the full battery of these projects must be considered in an EIS for the latest Overland Pass project.
		Further, the HTNF has authorized major fire destruction (including burning of sagebrush – because the Forest Ranger apparently believes live cheatgrass is better than dead sage) across much of the North Schell Range, and has a slew of other very damaging projects in the hopper. To the east, Elko BLM has authorized major destruction of both sagebrush and PJ in the Spruce Range – through a battery of weed-spawning chemical, mechanical and fire treatments in this extremely cheatgrass-prone landscape in the rain shadow of the Ruby Mountains.
		Missing from all the Ely BLM gibberish about Fuels and FRCC (that pervade the flawed Watershed analyses linked to the greatly deficient RMP that also relies on the analyses) is any current science on fire intervals, historical disturbance, etc. Analyses are always based in NV on wildly inaccurate fire return and disturbance intervals, and downplay the very serious risk of treatment greatly exacerbating cheatgrass.
		This project proposal must carefully identify all of these types, and it cannot rely only on the often flawed soil surveys which were conducted recently, and just concluded that whatever was growing on most sites - like past BLM “treatments” - was what was supposed to be there.
		Western Watersheds provided literature regarding pinion and juniper ecosystems and fire.
		Across nearly the entire elevational range of the sprawling proposed Overland Pass Project Area, especially on south or west facing slopes, any use of fire greatly increases risk of cheatgrass, as cheatgrass has adapted to grow at higher and higher elevations and broader range of soils types. Climate change is expected to increase temperatures and other conditions that favor cheatgrass. Livestock grazing and trampling disturbance retard site recovery, and agency policies provide for only minimal and greatly inadequate rest following “treatments”.
		Given all the negative drawbacks associated with aggressive mechanical, chemical or fire treatments, including the significant risk of flammable invasive cheatgrass or other weed expansion –and the huge amount of already planned habitat destruction in the PJ and sagebrush biome, it makes no sense whatsoever for the BLM and FS to conduct new large-scale vegetation destruction projects here.
		If the agencies really want to improve habitat, they ought to concentrate on restoring sagebrush in the crested wheatgrass dead zones near Lindsay Creek and similar areas on the benches and alluvial fans to the north, plus areas burned in fires shown on the map, and address the very deleterious livestock grazing. Any removal of trees for sage-grouse should be conducted with selective hand cutting.

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		Further, burning large areas here will make it more likely that more bighorn sheep will die due to disease-infested domestic sheep, as removal of forested vegetation will facilitate bighorn movement.
		We have many other concerns, and request a site visit and to be kept on the project list. We are greatly concerned at the statement in the letter about dropping those who do not comment from the list.
		We also request a moratorium on all Ely BLM treatments until a full review and accounting of the serious adverse impacts to native biota of all the projects that Ely has conducted over the past decade can be undertaken.