

APPENDIX C
RESPONSES TO COMMENTS

Appendix C: Responses to Comments

Comments were accepted on the *Bulletproof Tactical LLC Tactical Vehicle Off-highway Operations Project* Environmental Assessment (EA), DOI-BLM-NV-C010-2014-0006-EA, from December 23, 2013 through January 27, 2014; although comments received in a timely manner after this date were also considered.

Postcards to 25 individuals, organizations and agencies were mailed on December 23, 2013. Emails were also sent that day to 4 individuals, organizations and agencies. Notification of the availability of the EA to 70 other State and federal offices was made through the Nevada State Clearinghouse on December 24, 2013. The Carson City District (CCD) published a news release on December 23, 2013 that was sent to media outlets listed on the Nevada BLM State Office media list. Project information was provided to the Tribes on September 5, 2013. The letter included a description of the proposed project, a map of the project location, and an invitation for comments or feedback regarding the project. No formal response detailing any concerns has been brought forward by the Tribes to date, but consultation is ongoing.

Although not required for an EA by regulation, an agency may respond to substantive and timely comments. Substantive comments: 1) question, with reasonable basis, the accuracy of information in the EIS or EA; 2) question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis; 3) present new information relevant to the analysis; 4) present reasonable alternatives other than those analyzed in the Environmental Impact Statement (EIS) or EA; and/or 4) cause changes or revisions in one or more of the alternatives. No response is necessary for non-substantive comments (BLM, 2008). All comments were reviewed, considered, and incorporated into the EA, as appropriate. Distinct topics and comments are summarized in Table 1.

Comment letters were received from 3 individuals, Federal and State agencies by email, fax or mail. The Federal Agency that commented was the Department of Defense – Naval Air Station Fallon. State agencies that commented include the State Historic Preservation Office (SHPO) and the Nevada Department of Wildlife (NDOW). Minor non-substantive changes were made to the EA as a result of the individual letters (noted in the response table below).

Table 1: Response to Comments Received on the Bulletproof Tactical LLC Tactical Vehicle Off-Highway Operations Project Environmental Assessment

#	Comment	BLM Response
1	Para 2.1: Regarding the "Navy Munitions Command (NMC) Fallon Gravel Quarry" - Add the legal description location of the Fallon Gavel Quarry in Churchill County to Table 2.1-1.	This information has been added to the EA.
2	General concern regarding potential conflicts with scheduled military training.	As stated in the Environmental Protection Measures, section 2.1.5, "BPT would notify the BLM military liaison as soon as any training event is scheduled to ensure that the proposed route is available and does not coincide with other BLM-authorized events." The BLM military liaison will coordinate with NAS Fallon regarding upcoming trainings as well to ensure further conflicts.
3	Figure 5, Sand Mountain: This is where the Sand Mountain Blue Butterfly lives. There are restrictions on motorized use in the 2006 Sand Mountain Blue Butterfly Conservation Plan. The Hardy's Aegialian Scarab beetle and NV Oryctes also live in this area. They are listed in the NV Natural Heritage Program At-Risk Tracking List, your reference on Page 32. The species are also mentioned in the BLM Salt Wells Energy Projects EIS.	The proposed training route shown on Figure 5 is within the open sand dune area and is not located within the habitat of the Sane Mountain Blue butterfly.
4	The SHPO supports this document as written.	Comment Noted
5	<p>NDOW has a couple of suggestions:</p> <p>The document states on page 24, second paragraph, "NDOW identified five known lek sites in the vicinity of the northern Washoe County portion of the Project Area, but there are no known active leks within 3.2 miles of the proposed training and access routes in Washoe County". We recommend including the following sentences, "NDOW has documented sage-grouse use (i.e. nesting and brood-rearing) and much sign on the north end of the Dogskins. Based upon this documentation a small lek may occur in the vicinity of route 21; however, no leks have been documented." For your information, a collared sage-grouse has been documented within ~ 1.3 miles (was UTM 11 S 256429 x 4425629.) of route 21. A hen also nested on the North end of the Dogskins.</p>	<p>To address the concern of NDOW, the following language has been added to the Game Bird Section on page 24.</p> <p>"NDOW has documented sage-grouse use (i.e. nesting and brood-rearing) and much sign on the north end of the Dogskins in the Preliminary General Habitat (approximately 1.5 miles away from Route 21). Based upon this documentation, a small lek may occur in the vicinity of route 21; however, no leks have been documented. If a lek is found within 3.2 miles of a proposed training or access route, and it is determined by BLM that the use of these routes could negatively impact greater sage-grouse lekking and/or nesting behavior, timing restrictions will be applied to training activities in the future."</p>