

Appendix D – Response to Public Comments (from Draft EIS)

The table below documents the review of comments for the BOSH Draft EIS (DEIS). The BLM received 56 emails and letters and numbered them based on the date they were received. The table is organized by letter number and comments gleaned from letters have been numbered. Additionally, the BLM received over 2,000 nearly identical form letters labelled “F”. All correspondence was taken into account in the preparation of the Final EIS (FEIS), but only comments that required a response/explanation are included in the table. Issues and alternatives identified through this review have been incorporated in the FEIS. All comment letters and emails are part of the project record.

Sender	Letter/Email Number
Jean Public	1
Jim Myron	2
WildLands Defense (Fite)	6
The Wilderness Society	11
Karen Steenhof	14
Oregon Wild (Heiken)	15
WildLands Defense (Fite)	17
Cynthia Patterson	19
Andrew Follett	20
Brandt Mannchen	21
Peter Alpert	22
Rose Chilcoat	23
Clarence Sanders	24
Louise Wallace	25
Jodie Young	27
Karen Steenhof	28
Vince Murray	29
WildLands Defense (Fite)	30
Jeff Lonn	31
WildLands Defense (Hayes)	32
Mule Deer Foundation (Belinda)	33
North American Grouse Partnership (Belinda)	34
National Park Service (Hurd)	35

Sender	Letter/Email Number
Great Old Broads for Wilderness (Lowe)	36
Idaho Department of Fish and Game (Yarbrough)	37
Idaho State Department of Agriculture (Jacobson)	38
Wilderness Watch (Macfarlane)	40
George Wuerther	42
Western Watersheds Project & Boise Broadband (Cole)	43
Governor's Office of Species Conservation (Miller)	44
Idaho Department of Lands (Laney)	45
WildLands Defense (Fite)	46
WildLands Defense (Fite)	47
James Woods	48
Richard Stanley	51
U.S. Department of Agriculture (Elke)	53
U.S. Fish and Wildlife Service (Hughes)	55
Shoshone-Paiute Tribes (Howard)	56
Form letters	F

Response ID#	Theme	General Comment	Letter/ Email #	Response	FEIS Location
001	ACEC	Full and fair evaluation of ACECs to protect important remaining native plant and animal communities must be considered.	17, 43	Impacts to ACEC and their values are addressed in the FEIS.	Section 3.9 Areas of Critical Environmental Concern
002	Additional Alternatives - Grazing	No grazing; No grazing in sensitive areas; Reduced grazing (change utilization levels in all systems); Drastically alter grazing management (alter timing, remove fences, include active and passive restoration of wetlands and uplands not meeting land health standards);	17, 43, F	These proposals were considered and addressed in section 2.7 of the FEIS. Changes to grazing management are outside the scope of this project.	Section 2.7 Alternatives Considered but Not Analyzed in Detail
003	Additional Alternatives - ACEC	Create ACEC(s) to protect important sage-grouse habitats from grazing and other disturbances.	17	This proposal was considered and discussed in section 2.7 of the FEIS. ACEC designation is outside the scope of this project.	Section 2.7 Alternatives Considered but Not Analyzed in Detail
004	Additional Alternatives - Treatments Restricted to Sage-grouse Habitat Outside Grazing Allotments	Restore sage-grouse habitat outside of grazing allotments using selective hand cutting of younger juniper trees in the vicinity of sage grouse leks and important use areas.	43	This proposal was considered and discussed in section 2.7 of the FEIS. Restricting juniper treatments to lands outside of grazing allotments in the project area would not meet the purpose of and need for large-scale juniper removal to, in turn, improve habitat for sage-grouse. Approximately 50,000 acres of the project area are not allocated for livestock grazing. An alternative that would only treat areas outside of grazing districts would reduce the treated area by 567,000 acres.	Section 2.7 Alternatives Considered but Not Analyzed in Detail

005	Carbon/Climate Change	The DEIS fails to provide a quantified analysis of the significant long-term transfer of carbon from the ecosystem to the atmosphere. BLM must manage its lands and be part of the solution (keeping carbon in ecosystems) instead of part of the problem (causing greenhouse gas (GHG) emissions by killing native trees across 100s of thousands of acres and contributing to climate change).	15	BLM acknowledges that the project will release carbon into the atmosphere. However, the project's potential impacts on climate change, global carbon sink, and contribution to GHG emissions are difficult to quantify due to uncertainty and variability of estimates (see Section 3.14 Carbon Sequestration). The project proposes to cut and leave 86% of junipers in focal treatment areas. Over the 10-15 year life of the project, a total of 14% of focal treatment areas or 6% of the entire project area may be cut and burned. Within and around to the project area, juniper will continue to grow and expand.	Section 3.14 Carbon Sequestration
006	Carbon/Climate Change	The NEPA analysis must avoid minimizing this project's contribution to carbon emissions and global warming by saying the effects of this project would be negligible on a global scale. All emissions are part of the problem, and all land management decisions must be part of the solution.	15, 40, 43	A section on Greenhouse Gases and Climate Change has been added to the FEIS.	Section 3.14 Carbon Sequestration
007	Carbon/Climate Change	Carbon emissions due to juniper removal and burning would reduce above-ground accumulation of carbon.	15	BLM acknowledges that the project will result in some carbon emissions, particularly from jackpot and pile burning. However, most of the juniper would be felled and left on site, thereby leaving carbon available for uptake by other organisms and/or soils. Estimates on carbon stock and emissions associated with jackpot or pile burning have been added in the FEIS (Section 3.14 Greenhouse Gases and Climate Change).	Section 3.14 Carbon Sequestration

008	Carbon/Climate Change	How will the release of stored carbon due to juniper removal be mitigated?	2	BLM does not intend to mitigate any juniper removal. BLM has provided a range of estimates for carbon sequestration and carbon release in the FEIS. Impacts on global carbon sequestration are difficult to quantify due to model assumptions and a range of estimates for input variables. In most of the treated areas, junipers would be cut and left and some juniper would be returned to the ecosystem. BLM's actions will increase ecosystem resilience to climate change, wildfire and invasion of exotic annual grasses. Therefore, BLM's actions may reduce the long-term transfer of carbon from sagebrush-ecosystems to the atmosphere and assist with adapting to climate change.	Section 3.14 Carbon Sequestration
009	Carbon/climate change	Intact native habitats, such as sagebrush and juniper, are important to buffer against impacts of climate change.	17	The goal of the project is to maintain sagebrush steppe habitat in the project area. Several hundred thousand acres of juniper would remain in the project after treatment, maintaining a diversity of habitat types across the landscape. Without juniper treatment, juniper encroachment and development would continue thereby further reducing sagebrush habitats. Without vegetation management, the risk of wildfire and the invasion of cheatgrass in dense juniper woodlands would increase, thus negating potential benefits of juniper growth against climate change.	Sections 1.0 Introduction and 2.3-2.7 Description of the Alternatives, and Section 3.14 Carbon Sequestration
010	Causes of Juniper Expansion	Need to address grazing's role in habitat degradation as a causal factor for juniper expansion, and therefore, grazing management should be changed to restore sagebrush steppe habitat.	15, 17, 19, 30, 36, 40, 43, 47, F	Historic grazing practices are identified in the FEIS as a cause of habitat loss/degradation of sagebrush steppe habitat. The BLM recognizes that there are numerous threats to sage-grouse habitat and causes for juniper expansion; however, the focus of this EIS is juniper removal to improve sage-grouse habitat. The BLM considered numerous proposals to change livestock grazing management in section 2.7 of the FEIS. Changes to grazing management are outside the scope of this project.	Section 1.0 Introduction; Section 2.7 Alternatives Considered but Not Analyzed in Detail

011	Causes of Juniper Expansion	Need to address the role of fire suppression/lack of natural fire as a causal factor for juniper expansion. Analyze fire reintroduction for juniper control.	15, 31, 36, 40, 42, 43, F	The role of fire suppression/lack of fire in the expansion of juniper is addressed in the FEIS in section 1.0. Changes to fire suppression practices are outside the scope of this project. Introduction of fire would result in the loss of sagebrush and sage-grouse habitat. The proposed action maintains sagebrush on the landscape and therefore maintains sage-grouse habitat.	Section 1.0 Introduction
012	Causes of Juniper Expansion	Expansion of juniper is normal/natural fluctuation in density and range; expansion is a response to changes in climate.	15, 40, 43	The potential role of climate change in the expansion (and contraction) of juniper range is addressed in the FEIS in section 3.14.	Section 3.14 Carbon Sequestration
013	Cultural Resources	Include protections (flagging, monitoring, etc.) to OR Trail, specifically high potential historic sites and a high potential route segment identified in the 1999 comprehensive plan/EIS (Utter Massacre site, Givens Hot Springs, and Sinker Creek segment) to avoid direct and indirect impacts.	35	None of these high potential sites and segments are in the project area: the Utter Massacre site is about 6 miles east of the project boundary; the Givens Hot Springs site is on private property about 0.4 miles northeast of the project boundary (east of Highway 78) and 1.5 miles from the nearest proposed treatment; and the Sinker Creek segment is approximately 4 miles east of the project boundary. Roughly 2 miles of Oregon Trail crosses the project area on private land. Design features, mitigation measures, and best management practices (Section 106 compliance and 2014 State Protocol Agreement) are in place to mitigate direct and indirect impacts to national historic trail (NHT) resources. If future treatments are proposed adjacent to the trail where the setting may be affected, measures will be taken to avoid or mitigate those impacts per design features and best management practices.	Section 1.6 Relationship to Statutes, Regulations, and Other Requirements; Section 2.2.5 Design Features; and Section 3.11 Cultural Resources
014	Cultural Resources	Cultural Resources not sufficiently protected.	17, 30, 43, 46	Extensive design features, mitigation measures, and best management practices (Section 106 and 2014 State Protocol Agreement compliance) are in place to mitigate direct and indirect impacts to cultural resources; potential impacts are analyzed and disclosed in the FEIS.	Section 1.6 Relationship to Statutes, Regulations, and Other Requirements; Section 2.2.5 Design Features; and Section 3.11 Cultural Resources

015	Cumulative Impacts	Need to include existing IDL activities in cumulative impacts analysis (i.e., mineral leases and reclamation plans)	45	Addressed in the FEIS.	Section 3.0 and individual resources cumulative impacts
016	Cumulative Impacts	Need to address other BLM actions	6, 17, 29, 30, 36, 40, 43, 47, 51	The cumulative effects section addresses numerous BLM actions including mining, recreation, livestock grazing, travel management, fuel breaks, juniper treatments, and exurban development.	Section 3.0 Affected Environment and Environmental Consequences
017	Cumulative Impacts	Analyze effects of existing fences on avian mortality (sage-grouse and other species), increasing predator travel corridors, nest predator perches, brood parasite perches, habitat fragmentation, and sage-grouse in general. Calculate the current fence density and map in relation to sensitive species habitats.	17, 43	Fencing is an aspect of livestock grazing and has been addressed under Cumulative Impacts - Wildlife in the FEIS since the project will not change amount of fencing in project area.	Section 3.5.3.2 Cumulative Impacts - Wildlife -- Current Conditions and Past, Present, and Reasonably Foreseeable Future Actions

018	Cumulative Impacts	Effect of livestock grazing on riparian areas, sagebrush ecosystem, and sage-grouse; the DEIS must consider the serious cumulative impacts on sage-grouse. It fails to consider in adequate detail the many other harms sage-grouse are subject to in the project area, such as annual grasses and fire cycles, and how this project will impact them. It fails to consider how the increased intensity of livestock grazing facilitated by this project will adversely affect sage-grouse in the project area. It fails to consider other impacts such as proposed and implemented fuelbreaks, as well as power lines and other infrastructure.	6, 17, 30, 43, 46, 47	Cumulative effects of livestock grazing are analyzed for riparian areas (including water quality), sagebrush communities, and sage-grouse in the Cumulative Impacts sections for these resources in the FEIS. The FEIS discloses the impacts of numerous past, present, and future actions including livestock grazing (and associated infrastructure - fencing), fuel breaks projects, wildfire, mining, exurban development (including power lines), other juniper treatments, and recreation.	Section 3.0 Affected Environment and Environmental Consequences (Cumulative Impacts)
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019	Cumulative Impacts	Relationship to Fuel Breaks	6, 17, 30, 46, 47	<p>BOSH treatment areas overlap some fuel break treatment areas (approximately 7,400 acres), as the fuel break treatment areas are located within 200 feet of existing roads. However, the BOSH treatments will rarely, if ever, overlap with implementation of the fuel breaks projects. Juniper removal will help remove fuels and may provide some similar benefits, but it is not intended to replace the projects that are specifically developed to create fuel breaks.</p> <p>As disclosed in the FEIS, fuel breaks are likely to expand existing disturbed areas, which may result in some additional fragmentation of sage-grouse habitat. The BOSH project is intended to ameliorate that impact somewhat by improving existing marginal habitat. Phase I and II juniper tend to be scattered in sagebrush steppe habitat, which means that removing the Phase I and Phase II juniper within a treatment area will improve habitat for sage-grouse within that area, as it will eliminate predator perches, and allow for growth of sage-brush, perennial grasses and forbs.</p> <p>Potential cumulative impacts from ongoing or planned fuel breaks projects are disclosed for each resource in the FEIS.</p>	Section 3.0 Affected Environment and Environmental Consequences - Cumulative Impacts; Cumulative Impacts - all resources (3.X.3)
020	Cumulative Impacts	Relationship to TMP	6, 17, 30, 46, 47	There is no relationship between the BOSH project and travel management planning, other than they are both BLM actions. The BOSH project is to improve and maintain sage-grouse habitat, whereas, the TMP work is to manage roads and travel on BLM managed lands.	Section 3.0 Affected Environment and Environmental Consequences

021	Fire	Let natural fires burn/reintroduce fire; consider/analyze changes to fire suppression.	15, 19, 21, 24, 51	<p>The authorization for using natural fire as a management tool is outside the scope of this EIS. Fire is one of the major threats to sage-grouse habitat and causes of habitat fragmentation identified in the Sage-Grouse Conservation Objectives Team Report (COT Report) (USDI USFWS 2013). Allowing natural fires to burn or reintroducing fire does not meet the purpose of and need for the project to maintain and improve sage-grouse habitat on a landscape scale. However, the 1999 Owyhee Field Office Resource Management Plan (OFO RMP) does allow prescribed fire to be used as a management tool to improve rangeland health and manage natural fire in certain areas (Juniper Mtn. area) when conditions are appropriate.</p>	Section 1.0 Introduction
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022	Fire	Fire history and frequency data are wrong; fire return and disturbance models (fire regimes, historic fire return intervals, etc. not accurate); implication in draft EIS that removing Phase I or II juniper will decrease fire risk is false	17, 30, 47	<p>BLM did not use fire history or frequency data as rationale for the project. The references to fire frequency in the EIS are used to show that as fire occurs on the landscape, fire frequency would increase as annual grasses invade burned areas. Residual biomass from treatment of juniper (e.g., cutting, limbing, and mastication) would not inherently increase the likelihood of natural fire ignition, but fire behavior may be influenced by the proposed juniper treatments. There would be a short-term (1-2 year) risk of higher intensity and severity. Juniper treatments proposed in the vast majority of the 617,000-acre focal treatment area (and greater project area) include cutting, lopping and scattering low densities of juniper within the GS2 fuel model. Treating areas where juniper are sparsely distributed would have negligible or no effect on fire behavior where the primary carriers of fire are grasses and shrubs, and spread rates are generally high and flame lengths are moderate because the small number of juniper trees currently found on the landscape in such areas do not significantly inhibit the spread of fire.</p> <p>Regardless of the cause, the negative impacts of juniper expansion are well documented, and BLM's focus is to alleviate those impacts and maintain viable habitat for sage-grouse and other wildlife species. Therefore, fire regimes and fire return intervals are referenced in the FEIS, but these models are not used as a basis for analyzing where to treat early phase juniper.</p>	Section 3.0 Affected Environment and Environmental Consequences (Cumulative Impacts) and Section 3.12 Fire Behavior
023	Fire	How would the project affect fire frequency and severity?	2	As disclosed in the FEIS, although individual juniper trees are relatively fire resistant, and juniper-dense areas are more resistant to wildland fires than other vegetation types, the large majority of areas planned for treatment have a tree density that is too low to affect the overall fire regime.	Section 3.12.2 Fire Behavior-- Environmental Consequences

024	Grazing	Stop livestock grazing; remove livestock; reduce livestock grazing (Animal Unit Month (AUM))	6, 15, 17, 19, 20, 22, 27, 29, 30, 31, 32, 43, 46, 47, 48, 51, F	<p>The various threats to sage-grouse and its habitat call for a variety of management responses. Where appropriate, the BLM modifies livestock grazing to improve rangeland health, including habitat for sage-grouse. This does not mean that BLM must address livestock grazing impacts as part of every management action it undertakes.</p> <p>An alternative that modified livestock grazing was considered but not analyzed in detail because it did not respond to the purpose of and need for action, which is to address juniper encroachment.</p> <p>Since 2013, BLM has fully processed livestock grazing permits for almost half of the project area. Where needed, livestock management was altered to lead to improved conditions. The changes have included reductions in livestock numbers, shifts in seasons of use, and rest, among other management actions. BLM anticipates that permits for another 262,000 acres will be completed by the end of 2018. These management actions, which BLM intends to continue, support its assumption that livestock grazing will be managed to meet, or make significant progress towards meeting, land health standards, as required by the BLM's grazing regulations.</p>	Section 2.7 Alternatives Considered but Not Analyzed in Detail
025	Grazing	Increase allotted AUMs as more forage becomes available following juniper removal.	45	Changes to livestock operations are outside the scope of this project.	Section 2.7 Alternatives Considered but Not Analyzed in Detail
026	Grazing	Sec. 3.6.3.3 pg. 67 - clarify "improperly managed" grazing causes degradation, not grazing in general	38	Section 3.6.3.3 includes livestock grazing in the list of the past, present and reasonably foreseeable future actions/activities that affect wildlife; not necessarily causing degradation. The general cumulative effects of livestock grazing on wildlife are described in section 3.6.3.2.	Section 3.5.3.2 Current Conditions and Past, Present, and Reasonably Foreseeable Future Actions; Section 3.5.3.3 Alternative A - Cumulative Impacts (Wildlife)

027	Grazing	All aspects of grazing need to be addressed regarding role of grazing in ecological conditions, etc.	6, 17, 30, 46, 47, 48	Livestock grazing has been addressed for each resource in the cumulative effects analyses. The BLM considered numerous proposals to change livestock grazing management in section 2.1 of the FEIS. Changes to grazing management are outside the scope of this project.	Cumulative Impacts Sections (3.2.3, 3.3.3, 3.4.3, 3.5.3, 3.6.3, 3.7.3, 3.8.3, 3.9.3, 3.10.3, 3.12.3); Section 2.1 Alternatives Considered but Not Analyzed in Detail
028	Grazing	Complete a study to determine the impacts of grazing to sage-grouse	15, 17, 30, 43, 47	A Before-After-Control-Impact study was initiated in 2014 by University of Idaho and U.S. Geological Survey to evaluate the response of GRSG to grazing. For more information, see https://idahogrousegrazing.wordpress.com/ .	Section 3.5.3.4 Current Conditions and Past, Present, and Reasonable Foreseeable Future Actions (Alternative A-Cumulative Impacts-Greater Sage-Grouse-Grazing)
029	Grazing	Cause of loss of Sage Grouse habitat	32, 36, 40, 43, 47	Historic grazing practices are identified in the FEIS as one of the causes of habitat loss/degradation of sagebrush steppe habitat. The BLM recognizes that there are numerous threats to sage-grouse habitat and causes for juniper expansion; however, the focus of this EIS is juniper removal to improve sage-grouse habitat. The BLM considered numerous proposals to change livestock grazing management in section 2.1 of the EIS. Changes to grazing management are outside the scope of this project.	Section 1.0 Introduction; Section 1.1 Need for and Purpose of Action; and Section 3.5.1 Affected Environment--Wildlife/Special Status Animals--Greater Sage-Grouse

30	Weeds	Spread of noxious weeds not analyzed/addressed	2, 15, 17, 30, 32, 36, 38, 43, 47, 48	The potential spread of noxious and invasive weeds is analyzed in the FEIS.	Section 2.2.4 Methods - subheadings Vehicle Use, Pile and Jackpot Burning, and Mastication and Shearing; Section Design Features 2.2.5 - subheadings Vegetation and Noxious Weeds and Invasive Plants; Section 3.1.2 (Soils) Environmental Consequences
031	Invasive/Noxious Weeds	BLM does not employ integrated weed management and ignores weed proliferation caused by livestock	6, 17	The BLM Boise District's weed program inventories, treats, and monitors noxious weed infestations. This program also partners with Counties to form Cooperative Weed Management Areas to help control/stem noxious weed proliferation. In addition, the BLM has a bio-control program in place to treat noxious weeds across the state through biological means. These programs are integrated in an effort to control noxious weeds in the Boise District. The control of noxious weeds in the context of livestock grazing/livestock grazing management is outside the scope of this project.	Section 3.4 Noxious Weeds
032	Juniper	Concern about removal of old growth juniper	15, 17, 30, 47	Loss of old growth by contractor misidentification during treatments, or accidental take during burning is possible; however, design features and methods have been developed to minimize this potential.	Section 2.2.4 Methods; and Section 2.2.5 Design Features
033	Juniper	Consider marking old growth trees to prevent loss/cut during treatments	30	There are too many old growth trees within the project area to mark them all. The definition and description is provided to the contractors and they will apply those criteria as they treat juniper. This has proven to be very successful in past juniper treatment projects.	Not in the EIS

034	Juniper	In sagebrush communities, juniper removal should only involve hand cutting of trees < 10 ft high, and only where essential for sage-grouse	17	The focal treatment area has been identified by using sagebrush canopy cover, which means that all proposed treatment areas have sagebrush present. Using hand saws (e.g., pruning saws) would not be time effective or cost efficient. Only cutting trees <10 feet tall would not meet the purpose and need as there are several post-settlement trees that are over 10 feet tall. The project area was delineated based on the area used by 80% of nesting hens, in other words, essential habitat for sage-grouse.	Section 1.0 Introduction; Section 2.2.2 Focal Treatment Area Development; and Section 2.2.4 Methods
035	Juniper	Blanket deforestation could occur under this proposal without accountability	30	<p>Juniper treatments are proposed on approximately 37% of the project area. Treatments are prioritized to occur near to sage-grouse leks, targeting early encroaching juniper, not dense stands; and old growth junipers would not be treated. The project is a collaborative effort between several agencies and conservation groups. BLM has been and will continue to work closely with collaborators in project design including identification and layout of Annual Treatment Units.</p> <p>A small portion of the BOSH project area (3,374 acres) overlaps previously approved Phase III juniper removal projects in the Pole Creek and Trout Springs allotments. The overlap reflects similar GIS layer criteria; as such, the BOSH project necessarily captures lands within the project areas that have similar characteristics. If the Pole Creek/Trout Springs projects are successful, those portions the BOSH project will be unnecessary.</p>	Section 1 Introduction; Section 2.2.3 Annual Project Development, and 3.2.3.1, Environmental Consequences
036	Juniper	Jackpot burning could result in escaped fire and weed infestation	30, 47	The timing for jackpot burning is designed to reduce the likelihood of adjacent vegetation being consumed by fire. Jackpot burning would occur when the ground is wet, snow covered, or frozen. The likelihood of jackpot fire leading to the loss of vegetation from an escaped fire is negligible.	Section 2.2.3 Methods

037	Juniper	The extent of mastication is unclear, but is necessary for impact analysis.	30	Mastication would only occur within 200 feet of roads. Alternative C1 proposes the greatest amount of mastication, which is 8,000 acres. This equates to 1% of the focal treatment area.	Section 2.3 Comparison of Action Alternatives
038	Juniper	Juniper is important to the ecosystem. Proposed treatments would result in a drastic loss of juniper and biodiversity.	6, 15	Juniper will remain across the landscape, within and outside of the project area. Proposed treatments would lead to a mosaic of sagebrush steppe and juniper habitat and focus on early encroaching juniper, not dense stands or old-growth juniper. Several wildlife species use a gradient of habitat types except for sagebrush-obligate bird species, such as sagebrush sparrow and sage-grouse (Miller et al. 2005, Reinkinsmeyer et al. 2007). Treatment of juniper would benefit sagebrush-obligate species and sagebrush ecosystems and not result in a loss of biodiversity.	Section 1 Introduction; Section 2.2.2 Focal Treatment Area Development; Section 2.2.3 Methods; and Section 3.5.1 Wildlife/Special Status Animals--Affected Environment
039	Juniper	Leave juniper on site	15	Juniper would be left on site on 86-87% of the area treated. Areas where juniper canopy cover is at or near 20% may have too much biomass to effectively be scattered across the landscape or in areas where BLM would like to mitigate fire risk. In these areas, juniper may be jackpot or pile burned (12-13% of the area treated).	Section 2.3 Comparison of Action Alternatives; Sections 2.2.4-2.6 2.5 Alternative Descriptions 3.X.2 Environmental Consequences – all resources
040	Juniper	Is the wood available?	10, F	Yes, the felled juniper would be available to the public based on the wood permitting process and the associated rules and regulations.	Not in the EIS
041	Juniper	Create options for expanding use of heavy equipment (60m is arbitrary)	33, 34, 45	The 200-foot area near roads was not developed arbitrarily. It was designed to protect the public and firefighters in the event of a wildfire near roads during the time when felled juniper needles would be dry and easily combustible and therefore pose a threat to human safety. The 200 foot zone was established to reduce that threat. Further, the cost of treating juniper using heavy equipment is very high.	See Section 2.2.4-- Methods

042	Juniper	If possible (with USFWS and IDFG), decrease timing restrictions for treatments	33, 34	The timing restrictions are to protect sage-grouse and other BLM sensitive species and migratory birds during critical periods of their life history, e.g. breeding, or winter. Restrictions are in accordance with statutes, regulations, and other requirements (see Section 1.6).	See Section 1.5 Conformance with Applicable Land Use Plans; Section 1.6 Relationship to Statutes, Regulations, and Other Requirements
043	Juniper	Juniper has likely waxed and waned over the scale of millennial climate cycles.	15	This is true. Over the past 5,000 years, juniper woodlands have expanded and receded multiple times. However, the current rate of expansion is unprecedented (Rau et al. 2011). Further evidence stems from the fact that fewer than 10% of current woodlands are > 140 years old (Miller and Tausch 2001; Miller et al. 2008).	Section 3.14 Greenhouse Gases and Climate Change
044	Juniper	Juniper treatment not based on science	23, 30, 47	The project is founded on the latest scientific research, which indicates that juniper negatively impacts sage-grouse populations (Baruch-Mordo et al. 2013; Coates et al. 2017; Prochazka et al. 2017; and Severson et al. 2017c). Juniper treatments have been shown to improve habitat conditions for sage-grouse and increase populations (Sanford et al. 2017; Severson et al. 2017b; and Severson et al. 2017c).	Section 1 Introduction; Section 3.5.2.Environmental Consequences--Wildlife/Special Status Animals--Greater Sage-grouse
045	Juniper and Hydrology	How will removal of juniper effect hydrology	17, 30, 47	The effects of juniper removal to hydrology are discussed in the FEIS.	See Section 3.6.2 Environmental Consequences
046	Juniper and Hydrology	No scientific evidence of reduced quality and quantity of water due to juniper	15	This is discussed in the FEIS.	Hydrology sections 3.6.1 and 3.6.2
047	Juniper and Hydrology	Treatment will affect streamflow and potentially stress watersheds already affected by climate change	17, 30, 47	This is discussed in the FEIS.	Section 3.6.2
048	Juniper and Hydrology	Effects on water quality	11, 17, 30, 47	This is discussed in the FEIS.	Hydrology section 3.6.1 and 3.6.2
049	Monitoring	Recommend brief description of active raptor nest survey methodology	55	Raptor nest surveys will be conducted following standard protocols as described in Smith and Slater (2009), with a focus on areas where treatments may occur during the breeding season.	Section 2.2.5 Design Features--Wildlife; Appendix C - Monitoring Plan

050	Monitoring	Monitoring non-target species/ landscape response	11, 30, 33, 34, 36, 43, 55	Monitoring is essential for adaptive management as monitoring results identify if a change in management actions is warranted. BLM will monitor non-target species for their response to juniper treatments. BLM will focus on BLM sensitive species of migratory birds in sagebrush, juniper, and riparian habitats that may be affected by the project.	Section 3.5.2 Environmental Consequences-- Wildlife/Special Status Animals; Appendix C - Monitoring Plan
051	Monitoring	Continue effectiveness monitoring of juniper treatment 10-15yrs from initial treatment in order to identify areas that require retreatment to benefit sage-grouse; develop quantitative trigger with more specific & substantive protocol	37, 44, 55	Monitoring details including duration and intervals are described in the FEIS.	Appendix C - Monitoring Plan
052	Monitoring	Increase amount of sites - minimum 1 site per treatment unit of 40,000-60,000 acres will miss retreatment areas; appropriately scale number of transects to size & heterogeneity of treatment areas	37, 55	Monitoring details including general number of plots per treatment type by acres are described in the FEIS.	Appendix C - Monitoring Plan
053	Monitoring	Conduct careful pre- and post-treatment monitoring that includes both sage-grouse utilization, noxious weed surveys, forb and grass production, elevation of the water table, soil productivity, use by migratory birds and raptors, livestock utilization, hiding cover for elk, treatment costs, and length between treatments.	11, 30	BLM will monitor the primary indicators for treatment objectives described in the FEIS Monitoring Plan.	Appendix C - Monitoring Plan

054	Monitoring	Include maps where monitoring sites will be and explain how treatment effects will be evaluated	17	Monitoring details are described in the FEIS.	Appendix C - Monitoring Plan
055	NEPA	EIS does not analyze alternative methods of habitat improvement.	36, 40, 43, 51	Juniper has been identified as a primary threat to sage-grouse in southwest Idaho and this project focuses on the removal of that threat. True, there are other methods to remove juniper such as feller bunchers, mastication across the project area, and logging operations, but BLM has made an effort to take a light-handed approach to treatment by cutting with chainsaws and leaving juniper on site. This is also the most cost effective manner to treat the juniper. BLM considered an alternative to cut all juniper except old growth but it was not analyzed because there would have been a higher likelihood of negative impacts. Further, treating all late stage juniper would have required broadcast prescribed fire and would not have provided immediate benefits to sage-grouse or other wildlife as these areas would have required several years for sagebrush to reestablish. BLM is addressing other major threats to sage-grouse habitat such as wildfire by creating fuel breaks.	Section 1.0 Introduction
056	NEPA	Range of alternatives too narrow/purpose and need too narrow; DEIS does not address the underlying causes of the ecological change (juniper encroachment) it proposes to address/manipulate	17, 30, 36, 40, 43, 47	The purpose and need for this project is narrow. The focus of the project is simply to maintain and improve sage-grouse habitat by removing encroaching juniper. BLM designed the alternatives to treat juniper with the least amount of impact using methods that have been used in several juniper projects across the west. The project was designed to be effective in treating juniper and provide immediate benefits to sage-grouse and other sagebrush obligate species. Several alternatives were considered but BLM did not analyze them because they did not meet the purpose or need and/or they did not provide immediate benefits to sage-grouse.	Section 1.1 Need for and Purpose of Action

057	NEPA	Not scientifically based	17, 30, 40, 43, 47	The proposed action is founded in the most recent science that indicates sage-grouse are negatively impacted by juniper encroachment at a population level (Baruch-Mordo 2013; Coates et al 2017; Prochazka et al. 2017, Svereson et al. 2017a), and that treatment of juniper has been shown to have population level benefits (Gibsone et al. 2016; Severson et al. 2017b).	Section 1.0 Introduction
058	NEPA	Inadequate baseline data and poor impact analysis of the various alternatives; must conduct baseline surveys of all sensitive species (plants, wildlife, aquatic species) and invasive/noxious weeds and analyze impacts to local and regional populations	17, 30	The BLM includes existing available data from multiple sources (e.g., IDFG, ISDA, NRCS, BLM, USGS, etc.) to conduct its analyses. It is also BLM's standard operating procedure to conduct project clearances (i.e., surveys specific to a proposed project) for sensitive and important resources during project planning and prior to implementation. Clearances not only serve to augment our existing/prior knowledge of these resources in the project area and to facilitate analyses, but also to mitigate potential impacts with the application of specific design features (e.g., avoidance buffers), or further, to eliminate impacts if a negative clearance results (i.e., a given area may be designated off limits to treatments). Further, implementation and effectiveness monitoring - including HAF and other vegetation attributes (core indicators) and responses - will be conducted for life of the project.	Section 3.0 Affected Environment and Environmental Consequences; 2.2.7 Monitoring; Appendix C Monitoring Plan

059	NEPA	<p>The NEPA implementing regulations refer to the selection and review of alternatives as “the heart” of the environmental review. 40 C.F.R. § 1502.14.</p> <p>Comparison of the alternatives helps to “sharply defin[e] the issues and provid[e] a clear basis for choice among options by the decision maker and the public.” Id. Although the BLM ostensibly considered 3 alternatives in the DEIS, all of the action alternatives employ the same treatment methods, varying only in scale and location. The BLM’s failure to consider any alternative methods in the DEIS amounts to a failure to consider alternatives.</p>	43	<p>It was the BLM's intention to propose a project that would be cost effective and provide maximum benefit to sage-grouse (and other sagebrush obligate species) as soon as possible following treatment by addressing one of its threats (i.e., juniper encroachment). The BLM considered numerous other alternatives generated from scoping and comments received on the draft EIS; however, none of these met the purpose and need of the project. Therefore, the BLM maintains that the no action, action, and other alternatives (considered but not analyzed in detail) represent an appropriate range.</p>	<p>Section 1.1 Need and Purpose of Action; Section 2.7 Alternatives Considered but Not Analyzed in Detail</p>
060	NEPA	<p>EIS is not site-specific; recommends Supplemental EIS</p>	15, 17, 40, 43	<p>On-the-ground situations, such as vegetation types and land uses, are similar across the project area and the proposed treatment methods are designed to reduce the potential for impacts to resources. Further, treatment methods are straightforward and would be the same for each treatment unit. The appropriate clearances would be completed or supervised by subject matter experts prior to any work being implemented and the design features would be followed for each treatment area to ensure resource protection and plan compliance.</p>	<p>Section 2.2.3</p>

061	NEPA	"BLM ignores sensitive species, forestry, vegetation, soils, recreation, wild lands and other protections of the Land Use plans in its claims of RMP compliance. Until BLM fully lays out the values of western juniper communities and the flora and fauna that inhabit them, and the wild lands, watersheds and recreational values that they provide, BLM cannot make a valid determination of RMP compliance."	30	The BLM maintains that this project is in conformance with the Bruneau MFP, Owyhee RMP, Idaho and Southwestern Montana Greater Sage-Grouse ARMPA, and Owyhee Canyonlands Wilderness and Wild & Scenic River MP per the plans' numerous goals and objectives cited in the EIS. Further, many project design features have been developed and will be applied to protect the following resources: cultural and paleontological resources, wilderness, wildlife (including special status animals), hydrology and fisheries, vegetation, special status plants, and air quality.	Section 1.5 Conformance with Applicable Land Use Plans (pp. 9-10); Section 2.2.5 Design Features (pp. 21-23)
062	NEPA	Evaluate cultural values of public lands, recreational uses, and scenic uses and enjoyment	17	These issues are evaluated in the FEIS under the appropriate sections: Recreation and Visual Resource Management, Cultural and Paleontological Resources, Social Characteristics.	Section 3.10 Recreation and Visual Resource Management; Section 3.11 Cultural and Paleontological Resources; Section 3.14 Social Characteristics
063	Other	Previous comments were disregarded on all impacts of grazing to sagebrush ecosystem, ACEC designation, spread of noxious weeds, and jackpot burning.	17, 30	All comments have been considered and addressed in some manner. An analysis of effects to ACECs has been included in the EIS, and livestock grazing impacts have been analyzed in the cumulative impacts sections for all relevant resources. An ACEC designation alternative was considered but not analyzed in detail; see ACEC designation comment response above in Theme: Additional Alternatives - create ACEC. See also comment responses re: noxious and invasive weeds in the livestock context above in Theme: Invasive/Noxious weeds. The threat of weed spread from project activities has been analyzed in numerous respective resources/sections (vegetation, soils, SSP, noxious weeds, etc.).	Section 2.7 - Alternatives Considered but Not Analyzed in Detail; Cumulative Effects Sections (3.2.3, 3.3.3, 3.4.3, 3.5.3, 3.6.3, 3.7.3, 3.8.3, 3.9.3, 3.10.3, 3.11.3, 3.12.3); Sec. 3.1 - Soils; Sec. 3.2 - Veg; Sec. 3.3 SSP; Sec. 3.4 Noxious Weeds

064	Other	Explain phased approach of implementation; provide criteria	11	Phased/incremental implementation is explained in the FEIS and criteria for application of this approach are provided.	Section 2.2.4 Methods; and Section 2.2.5 Design Features
065	Other	Describe to what extent past BLM activities and fires have altered sagebrush and juniper habitats	17, 43	Past, present and reasonably foreseeable future actions/events that shape/impact the project area are disclosed and analyzed in the FEIS.	Section 3.0 Affected Environment and Environmental Consequences - Cumulative Impacts; Cumulative Impacts all resources (3.X.3)
066	Partnership	Strongly recommends Permittee involvement and coordination	38	Permittee involvement will occur as needed.	Not in FEIS
067	Partnership	Requests BLM commit to meet with partners annually & incorporate a process for collaboration to prioritize treatment areas	44, 54	BLM has worked closely with collaborating agencies in the development of the project and all aspects of the project. BLM looks forward to continued collaboration through the life of this project and will plan on meeting with collaborators both in an office setting as well as in the field to plan and evaluate the work being completed.	
068	Riparian	Cutting will allow more and uncontrolled cattle grazing, which could result in degradation of riparian areas and/or increased grazing pressure on sagebrush habitats	17, 30, 32, 36	There would be no changes to livestock management, no increase of AUMs, and therefore; no increased pressure on sagebrush habitats. In fact, by improving rangeland conditions through juniper removal there would be less pressure on the existing healthy rangelands and riparian areas.	Section 2.7
069	Riparian	Cutting in riparian areas violates INFISH standards and protocols	30	The proposed project meets the guidelines and moves habitat towards meeting Riparian Management Objectives identified in INFISH.	Section 1.6
070	Riparian	Protection measures for riparian areas are inadequate; insufficient greenline buffer	11, 17, 30	BLM has numerous design features in place to limit potential impacts to riparian areas as described in the FEIS. Treatment of juniper in riparian areas complies with the Owyhee RMP and INFISH guidelines.	Sections 1.5, 3.6 and 3.7

071	Riparian	Sediment Issues and unstable banks	11, 30	Sedimentation/erosion and bank stability issues as a result of juniper treatments is discussed/analyzed in the FEIS. Numerous design features will be in place to minimize the potential for erosion and bank instability.	Section 2.2.5 Design Features; and Section 3.6.2 Hydrology-- Environmental Consequences
072	Riparian	Stream temperature increase	11, 30	Phased implementation, dropping juniper on stream banks, willow plantings, and reestablishment of riparian hydric plant species will enhance stream shading and enable an increase in functional condition of streams leading to a more stabilized stream channel. These aspects will help regulate stream temperatures according to stream potential.	Section 2.2.5 Design Features (Pg. 21); and Section 3.7.2.2 for effects of juniper removal on functional condition of streams (Pg. 82).
073	Sensitive Plants	Flagging sensitive site may make it a "target"	36	Some areas with special status plant species present may require flagging. Treatments in the interior, more remote portions of the project area (which is the majority) would not be visible to the public so flagging, if necessary, would not create a target for public disturbance, vandalism, etc. Further, with today's current GPS technology (1-5 meter accuracy or better) and the requisite avoidance buffers (15-150 meters depending on treatment method), avoidance buffers mapped on GPS could eliminate the need for flagging in most cases, particularly in more visible treatment areas (i.e., alongside/adjacent to roadways). Further, it is unlikely that people will know the purpose for the flagging; therefore, the potential for vandalism is negligible.	Section 2.2.5 Design Features - subheading Special Status Plants (p 21)
074	Soci-Econ	Recommends including social-ecological impacts study and reference article to give public easier access to the results	38	The research paper that published this study was cited in the FEIS, and is now part of the project record.	Section 3.15 - Social Characteristics
075	Soils	Need to address the importance of biological soil crusts and impacts (impacts from off-road vehicle (OHV), heavy equipment, etc.)	15, 17, 30, 32, 36, 43, 47, 48	Biological soil crusts have been added to the impacts analysis in the FEIS.	Section 3.1 Soils

076	Soils	Impacts to soils from heavy equipment, burning, OHV use	15, 17, 30, 32, 36, 43, 47, 48	Impacts to soils from all treatment methods and associated tools/procedures (heavy machinery associated with mastication, OHV use associated with cutting, and jackpot and pile burning) have been disclosed in the FEIS.	Section 3.1 Soils (3.1.2 Environmental Consequences)
077	Soils	Impacts to soils from OHV use	17, 30, 36, 47	OHV impacts to soils are disclosed in the FEIS.	Section 3.1 Soils (3.1.2 Environmental Consequences)
078	Soils	Juniper has few detrimental impacts to soils	15	Impacts to soils as a result of juniper encroachment are discussed in the FEIS.	Section 3.1 Soils (3.1.2 Environmental Consequences)
079	Vegetation	Inadequate mapping or identification of vegetation: BLM relied on old PNNL cheatgrass mapping from 2002, ignoring even the somewhat more recent Peterson 2006, 2007 information that found cheatgrass moving into hotter sites at higher elevations than previously thought. There is no valid baseline of cheatgrass presence, medusahead presence, and risk of expansion provided.	17, 30, 47	The BLM includes existing available data from multiple sources (e.g., IDFG, ISDA, NRCS, BLM, USGS, etc.) including PNNL, fire history, ecological site descriptions (and state and transition models), noxious weed inventory and treatment data, and special status plant survey information and population condition rankings and information from IDFG/IFWIS), etc. to inform the affected environment and to conduct its analyses. Resistance/Resilience data (Chambers et al. 2014) also used to inform vegetation and site conditions.	Section 3.2 Vegetation; Section 3.3 Special Status Plants; and Section 3.4 Noxious Weeds
080	Vegetation	NRCS Ecosite descriptions BLM relies upon to portray vegetation conditions are flawed and inaccurate; historical vegetation conditions not accurately portrayed.	17, 30	The BLM includes existing available data from multiple sources (e.g., IDFG, ISDA, NRCS, BLM, USGS, etc.) including PNNL, fire history, ecological site descriptions (and state and transition models), noxious weed inventory and treatment data, and special status plant survey information and population condition rankings and information from IDFG/IFWIS), etc. to inform the affected environment and to conduct its analyses. Resistance/Resilience data (Chambers et al. 2014) also used to inform vegetation and site conditions.	Section 3.1 Soils; Section 3.2 Vegetation; and Section 3.12 Fire Behavior

081	Vegetation	The DEIS fails to provide a project-specific baseline of the extent of cheatgrass and medusahead in the project area.	43	The BLM includes existing available data from multiple sources (e.g., IDFG, ISDA, NRCS, BLM, USGS, etc.) including PNNL, fire history, ecological site descriptions (and state and transition models), noxious weed inventory and treatment data, and special status plant survey information and population condition rankings and information from IDFG/IFWIS), etc. to inform the affected environment and to conduct its analyses. Resistance/Resilience data (Chambers et al. 2014) also used to inform vegetation and site conditions.	Section 3.2 Vegetation
82	Wilderness	Proposed action is inconsistent with the Wilderness Act.	2, 15, 19, 20, 21, 22, 23, 24, 25, 30, 36, 40, 43, 51	Analysis within the DEIS, as well as the Minimum Requirements Decision Guide, discloses effects to wilderness and acknowledges specific impacts to wilderness characteristics such as the untrammeled, undeveloped, and natural characteristics as a result of the proposed project, both positive and negative. BLM is privy to the contents of the Wilderness Act, however, much like public scoping, analysis of all of the alternatives presented in the DEIS is a necessary part of the decision making process.	Section 3.9 Areas of Critical Environmental Concern; and Appendix D Response to Public Comments (from Draft EIS)

083	Wilderness	MRDG conclusion not substantiated	30, 40, 43, 56	The MRDG is a tool used in the decision making process, not the actual decision. The MRDG was an exercise to compare three different methods (alternatives) of juniper removal in wilderness for the DS Proposed Action (Alt B) as the one alternative proposing treatment in wilderness. Of the three alternatives specific to the MRDG, Alternative 1, selected strictly for this MRDG exercise, is the least impactful to wilderness character. However, it should be noted that all three alternatives in the MRDG had a negative grade in relationship to their benefits to wilderness. The negative grade indicates that the overall impact to the wilderness characteristics analyzed would be negative. Management has yet to make a decision on the DEIS and what alternative will be implemented, and will use this MRDG as one of many tools in that decision making process, specifically when looking at Alt B.	Appendix D Response to Public Comments (from Draft EIS); see also Section 2.2.5 Design Features -- Wilderness
084	Wilderness	Keep as "control" with no manipulation	11, 42	This is a viable option and would be accomplished through the selection and implementation of Alternative C or C1, both of which propose No Treatment within wilderness.	Section 2.4 Alternative B - Treatment Including Wilderness
085	Wilderness	Restrict travel and tools to non-motorized	11	Any work within wilderness associated with Alternative B would be conducted on foot and would utilize the minimum tool (handsaws only) as described in the FEIS.	Section 2.3 Comparison of Action Alternatives

086	Wilderness	BLM acknowledges that there are many potential causes of sagebrush-steppe habitat decline, but focuses its proposed action on only one of those potential causes (juniper encroachment). While some of the other potential causes are clearly brought about by human initiated activity (e.g., grazing activities and invasive grasses) and thus good candidates for wilderness-appropriate management restrictions, juniper dispersal may be the result of natural processes in action.	40	Regardless of the cause of juniper expansion, habitat degradation for many species of wildlife is occurring due to juniper encroachment and this includes the area within wilderness.	Section 1 Introduction
087	Wilderness	Burning in wilderness should only be completed at higher elevations.	11	There is no burning proposed in wilderness areas. Juniper would be cut with the use of handsaws only and then scattered.	Section 2.4 Alternative B - Treatment Including Wilderness
088	Wilderness	Burning in wilderness would leave thousands of pock marks across the landscape.	30	There is no burning proposed in wilderness areas.	Section 2.4 Alternative B - Treatment Including Wilderness
089	Wildlife	Juniper encroachment a minor issue for sage-grouse	15, 17, 30	Juniper encroachment has been shown to have measurable negative effects and cause population declines in sage-grouse (Baruch-Mordo et al. 2013; Coates et al. 2017; and Prochazka et al. 2017). Juniper treatments have been shown to improve habitat conditions for sage-grouse and increase populations (Severson et al. 2017; and Sanford et al. 2017).	Section 1.0 Introduction; Section 1.1 Need for and Purpose of Action; and Section 3.5.1 Affected Environment--Wildlife/Special Status Animals--Greater Sage-Grouse

090	Wildlife	Based on a map from the Sage-grouse Initiative, juniper encroachment is a minor issue for sage-grouse in the project area.	15	The map being referenced does not accurately portray the juniper situation on the ground. The map is a general view where we have used data that identifies individual tree canopies. We used the latest technology and data to identify our focal treatment area which has much more juniper in it than is illustrated in the Sage-grouse Initiative map.	Section 2.2.2 Focal Treatment Area Development
091	Wildlife	Since juniper invasion often occurs on slopes and not valley bottoms which sage-grouse use, juniper treatment may be of little benefit to sage-grouse.	30, 42	Juniper invasion is not just associated with slopes but also flatter areas and riparian areas (Miller and Taush 2001; Miller et al. 2005). Juniper treatments would improve riparian and vegetative health conditions throughout the area, restoring existing shrub steppe, aspen and riparian communities. Restoration of these habitats will aid in the conservation and perpetuation of the greater sage-grouse and other species closely associated with sagebrush habitats.	Section 1 Introduction; and Section 3.5 Wildlife/Special Status Animals
092	Wildlife	Sage-grouse monitoring needs to be completed.	17, 30, 47, 55	Project implementation will take approximately 10 to 15 years, providing the opportunity for long-term monitoring and scientific studies. To document sage-grouse response to juniper treatments, the BLM plans to work with a university or other agencies in a long-term radio telemetry project. Monitoring of sage-grouse would focus on, but would not be limited to, the following: response to and use of treated areas, migration or other movement patterns, seasonal habitat availability and use, lek attendance, use of spring sites for brood rearing, changes in nesting areas, and survival.	Section 2.2.7 Monitoring-- Effectiveness Monitoring--Sage-grouse; and Appendix C - Monitoring Plan

093	Wildlife	Need to determine root causes of sage-grouse decline.	19, 21, 24, 30, 43, 47, 51	Declines of greater sage-grouse are primarily due to habitat loss, fragmentation and degradation resulting from wildfire, invasive species, pinyon and juniper encroachment, conversion to cropland, and urban development (USDI Fish and Wildlife Service 2010a, USDA BLM and USDI FS 2015). Additional threats include mining, oil and gas development, infrastructure (including power lines and fences), improper grazing, human disturbance, nest predation, and disease such as West Nile virus. We focus only on juniper because it is one of the main threats to sage-grouse in the project area along with wildfire and subsequent invasion of annual grasses (ISAC 2006).	Section 1.0 Introduction; and Section 3.5.1 Affected Environment--Wildlife/Special Status Animals--Greater Sage-Grouse
094	Wildlife	"re-think how best to recover dwindling sage grouse populations based on solid peer reviewed science specific to the birds actual habitat needs"	48	The project is founded on the latest scientific research, which indicates that juniper negatively impacts sage-grouse populations (Baruch-Mordo et al. 2013; Coates et al. 2017; and Prochazka et al. 2017). Juniper treatments have been shown to improve habitat conditions for sage-grouse and increase populations (Severson et al. 2017; and Sanford et al. 2017). With that being the case, the proposed juniper treatments are the best way to improve habitat and benefit sage-grouse in the project area.	Section 1 Introduction
095	Wildlife	Expand project boundaries to incorporate documented sage grouse and broods, also travel corridors	53, 55	This comment has been addressed in the FEIS and project boundaries have been altered as suggested by cooperating agency biologists.	Section 1.4 Project Changes Made after Release of the Draft Environmental Impact Statement (DEIS)
096	Wildlife	Incorporate active Oregon leks near state border into project area	37, 55	The FWS identified one lek just across the Idaho border they wanted to be included in the treatment area. This lek was added to the project area.	Section 1.4 Project Changes Made after Release of the Draft Environmental Impact Statement (DEIS)

097	Wildlife	Utilize GIS sagebrush canopy cover for potential treatment areas & priority category	53	The project area and potential treatment areas were reevaluated in the FEIS based on the updated GIS data for sagebrush and juniper canopy cover.	Section 1.4 Project Changes Made after Release of the Draft Environmental Impact Statement (DEIS)
098	Wildlife	Accurate occupied lek mapping vs historic leks	11	An accurate map of all the leks within the project area and their status is included in the FEIS.	Map 11 is located in Section 6.
099	Wildlife	Focus juniper treatment in PHMA	15	The focus of proposed Alternatives B, C and C1 is in PHMA, but this will not be exclusive in order to maintain connectivity within greater sage-grouse habitat. Fifty-four percent of the focal area is within PHMA. Furthermore, annual treatment units will be developed in collaboration with IDFG, NRCS, and FWS.	Section 2.2 Features Common to Action Alternatives--Annual Treatment Unit Development; and Section 2.4 Alternative B--Proposed Action
100	Wildlife	BLM planning to "grow" sage-grouse for "murderous hunters"	1	The purpose of this project is to restore, improve, and maintain Greater sage-grouse habitat at a landscape scale that is being and/or has been degraded by the encroachment of western juniper into sagebrush communities. This would also benefit other sagebrush-obligate species. The BLM does not manage hunting or "harvest" of sage-grouse. The Idaho Department of Fish and Game has statutory authority over the management of wildlife in Idaho, which includes monitoring population trends, developing hunting seasons and quotas, and overall management of wildlife.	Not within the scope of the project
101	Wildlife	BLM should "shut down the rabid murderous gun killers of sage grouse".	1	The purpose of this project is to restore, improve, and maintain Greater Sage-Grouse habitat at a landscape scale that is being and/or has been degraded by the encroachment of western juniper into sagebrush communities. This would also benefit other sagebrush-obligate species. The BLM does not manage hunting or "harvest" of sage-grouse. The Idaho Department of Fish and Game has statutory authority over the management of wildlife in Idaho, which includes monitoring population trends, developing hunting seasons and quotas, and overall management of wildlife.	Not within the scope of the project

102	Wildlife	Old growth juniper used by wildlife	15, 17, 30, 32, 47	Old growth juniper may provide important wildlife habitat including cavities and berries. Old growth juniper as characterized by Miller et al. (1999) is not targeted for treatment.	Section 2.2.4 Methods--Juniper Cutting; Section 3.5.1 Affected Environment--Wildlife/Special Status Animals--Cassin's Finch; and Section 3.5.2.3 Environmental Consequences--Wildlife Special Status Animals--Alternative B--Cassin's Finch
103	Wildlife	Bats, not analyzed	36	Effects to bats have been analyzed in the FEIS (Wildlife Section) and a design feature has been added to protect large bat maternity colonies from potential disturbance associated with treatment. Development of Annual Treatment Units in coordination with IDFG, NRCS, and FWS would identify any new or additional concerns about bat resources.	Section 2.2.5 Design Features--Wildlife; Section 3.5.1 Affected Environment--Wildlife/Special Status Animals--Long-eared Myotis; and 3.5.2 Environmental Consequences--Wildlife/Special Status Animals--Long-eared Myotis
104	Wildlife	Big game cover	11, 17, 27, 30, 32	Due to the large size of the project area and smaller areas targeted for treatment, some juniper will remain across the landscape. Therefore, cover will be available to big game, particularly since areas with > 20% juniper cover are not part of the proposed alternatives B, C, or C1. In areas targeted for treatment, more open habitats would benefit pronghorn antelope and bighorn sheep and improve forage and cover for young of all ungulates.	Section 3.5.1 Affected Environment--Wildlife/Special Status Animals--Pronghorn Antelope; and Section 3.5.2 Environmental Consequences--Wildlife/Special Status Animals--Pronghorn Antelope

105	Wildlife	Juniper woodlands have few detrimental impacts on aquatic organisms or wildlife	15	Juniper can impact the aquatic environment in several ways. Because juniper can increase the levels of erosion and sediment transport into streams (Pierson et al. 2010; Pierson et al. 2013; Williams et al 2014), there are negative impacts to aquatic organisms. The deleterious effects of sedimentation on stream habitats have been well documented (Berkman and Rabeni 1987; Carling and McCahon 1987; Wood and Armitage 1997; Cederholm et al. 1980). Fine sediment smother fish eggs and reduce reproductive success. Excess levels of sediment also impact macroinvertebrates production which also impacts fish negatively. Juniper also leads to bank instability and channel degradation, impacting the hydrology and ability of a stream to provide quality habitat for aquatic organisms.	Section 3.6 Hydrology and Section 3.7 Fisheries
106	Wildlife	The project would result in habitat loss and fragmentation for wildlife, as well as increased disturbance	17, 30	The project would result in some habitat loss for species that utilize the sagebrush steppe-juniper woodlands ecotone, but much habitat will remain in sagebrush steppe and as juniper woodlands. As a result of the project, habitat fragmentation of both sagebrush steppe and juniper woodlands may actually decrease. Removing juniper would not result in additional anthropogenic disturbance.	Section 3.5.2 Environmental Consequences-- Wildlife/Special Status Animals--Brewer's Sparrow and Cassin's Finch
107	Wildlife	Juniper provide habitat and food for some migratory birds	15, 17, 27, 30, 32, 43, 47	Disturbance to nesting migratory birds would be minimized with timing restrictions. There are no records of migratory bird species known to depend on junipers in the Owyhee Mountains, such as pinyon jay and juniper titmouse (USDI Geological Survey 2013). Several migratory birds which use the sagebrush-juniper ecotone may be affected by the proposed action, but many of these species have increased in Idaho and the Great Basin over the past decade (Sauer et al. 2017) and are not BLM special status species. Therefore, habitat loss for these species is not likely to result in population-level effects. In addition, BLM will monitor migratory birds pre- and post-treatment.	Section 2.2.5 Design Features-Wildlife; Section 3.5.1 Affected Environment-- Wildlife/Special Status Animals--Brewer's Sparrow and Cassin's Finch; Section 3.5.2 Environmental Consequences-- Wildlife/Special Status Animals--Brewer's Sparrow and Cassin's Finch; and Appendix C--Monitoring Plan

108	Wildlife	Concern regarding tree removal during nesting of migratory birds	30, 36	Potential impacts to nesting migratory birds will be minimized by restricting juniper treatment to outside of the peak breeding season, i.e., no treatment May 1-July 15 (or July 31 around occupied raptor nests). Where feasible, BLM would start annual treatments at lower elevations, where the majority of birds are done nesting by July 15.	Section 2.2.5 Design Features--Wildlife; and Section 3.5.2 Environmental Consequences--Wildlife/Special Status Animals
109	Wildlife	Recommend active/occupied raptor nest protection end date be extended to fledging <u>and</u> are no longer reliant on natal nest (may be as late as Aug 31 for some species)	55	In southwestern Idaho, the majority of raptor nests will have fledged by July 31. These nests will be protected from disturbance associated with the proposed action by either timing restrictions and/or disturbance buffers. Young that have fledged will be mobile and able to avoid disturbance.	Section 2.2.5 Design Features--Wildlife
110	Wildlife	Buffer areas should be established around all raptor nests with eggs or young/raptor nest protection	14, 28, 43	Species-dependent disturbance buffers for raptor nests (i.e., 0.25-1.0 mile; USDI BLM 2010) would be maintained through July 31, i.e., post-fledging for most raptors in the project area.	Section 2.2.5 Design Features--Wildlife
111	Wildlife	Terminology, active vs occupied raptor nests	14, 28	The terminology regarding raptor nests has been changed in the FEIS.	Section 2.2.5 Design Features--Wildlife
112	Wildlife	Will raptor nest trees be removed after 7/31?	43, 44	The majority of raptor nest trees will not be removed since old growth juniper trees will not be cut.	Section 2.2.4 Methods--Juniper Cutting
113	Wildlife	Need restrictions for disturbances (e.g. juniper cutting, grazing) in sage-grouse late brood rearing habitats	17, 43	In the late brood rearing stage, sage-grouse are highly mobile and can easily move away from areas where juniper treatment is occurring. Therefore, no timing restriction is needed for the late brood rearing phase.	Section 3.5.2.2 Environmental Consequences--Wildlife/Special Status Animals, Alternative B--Proposed Action

114	Wildlife	Seasonal restrictions for wildlife can be altered on a whim	30	The only design feature for wildlife that could be "altered" as described in the DEIS was: <i>"No mechanized treatment of juniper from November through February in sage-grouse winter habitat. However, these dates may be altered by recommendation of a wildlife biologist."</i> This was to address potential changes to sage-grouse winter habitat as a result of current telemetry studies. The text has been changed in the FEIS. BLM would obtain up-to-date information from IDFG on sage-grouse winter habitat in the project area prior to any winter treatment.	Section 2.2.5 Design Features--Wildlife; Section 3.5.2.3 Environmental Consequences--Wildlife/Special Status Animals--Alternative B--Greater Sage-grouse
115	Wildlife	Seasonal restrictions are too short for migratory birds in juniper, sage-grouse, and big game; specifically, the avoidance period should start Jan 1	30, 43	Seasonal restrictions as described in the DEIS/FEIS are designed to protect wintering sage-grouse from November through February. Restrictions during those months will also afford some protection for wintering big game. For migratory birds, seasonal restrictions extend to July 15 and through July 30 in areas around occupied raptor nests. These restrictions coincide with the peak breeding season for migratory birds.	Section 2.2.5 Design Features--Wildlife; Section 3.5.2 Environmental Consequences--Wildlife/Special Status Animals
116	Wildlife	The DEIS fails to disclose key baseline information such as sage grouse lek attendance numbers and trends within the project area.	43	The FEIS includes information on the status and trends of sage-grouse leks in the project area.	Section 3.5.1 Affected Environment--Wildlife/Special Status Animals--Greater Sage-grouse; and Section 6 Maps 11 and 12
117	Wildlife	Removal of junipers may also facilitate raven predation on sage-grouse by opening line of sight from fence posts. Thus conifer treatments could paradoxically result in less nesting habitat being available for sage-grouse.	43	Junipers provide much more effective perch sites than fence posts because they are taller and provide a larger field of view. Removing juniper, even near a fence, would reduce effective avian perches and thus is likely to improve conditions for sage-grouse.	Section 3.5.3 Cumulative Impacts--Wildlife/Special Status Animals--Livestock Grazing

118	Wildlife	Removal of junipers may expose many miles of fence and increase risks of sage-grouse collisions.	43	We are treating areas with low levels of juniper where existing fences would already be visible to sage-grouse.	Section 1.0 Introduction
119	Wildlife	It fails to analyze the strong likelihood that BLM will need to do this project over and over again due to the fact that junipers will grow back—and what impacts repeated “treatments” will have on sage grouse.	43	BLM agrees that re-treatment would be necessary in approximately 5 to 10 years to clean up smaller trees that were missed during the initial treatment. After this second treatment, no treatment would be needed for approximately 25 to 30 years. Recent research has shown that juniper treatments benefit sage-grouse populations (Severson et al 2017b). The initial follow-up treatment would be very light and would not impact sage-grouse as it would simply be a cut and leave of small trees. Further, subsequent treatments would be much easier and less costly to accomplish because the juniper would not be as big and there would not be as many trees present.	

120	Vegetation	Seeding not feasible on a large scale, heavily grazed areas won't revegetate	36	<p>BLM is not proposing large-scale seedings or seedings in response to livestock grazing impacts. Changes to livestock grazing management to address any deficiencies in land health-and in response to grazing permit renewal applications-require a separate and specific process (i.e., permit renewal NEPA per Title 43 of the Code of Federal Regulations Subpart 4100 - Grazing Administration). This project is limited to juniper treatments only and any seeding would be to mitigate impacts specific to project implementation (e.g., pile burning). To that end, there are numerous design features in place to mitigate potential impacts to vegetation, including the potential spread of invasive or noxious weeds. The design features in question include: "Juniper treatment areas would be inventoried (and previous weed treatments monitored) for noxious weeds prior to implementation in areas of concern (per consultation with the District Weeds Specialist); Areas considered susceptible to noxious weed spread would be monitored and treated (chemically or otherwise) post-juniper treatment; Noxious weeds may be treated before or after juniper treatment depending on the target species and type of herbicide, or be avoided to the extent possible to reduce the risk of spread; Chemical treatment of noxious weeds would adhere to the Boise District Noxious Weed EA (EA#ID100-2005-EA-265) and the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic EIS (USDI BLM 2007); Juniper treatment equipment (masticators, trailers), including vehicles (trucks and ATVs/UTVs) would be washed prior to use in the project area to reduce the potential for noxious weed or invasive species spread; and Native forb and grass seed (adapted to the site) may be hand broadcast at jackpot and/or pile burn sites or other areas</p>	Section 2.2.5 Design Features--Vegetation and Noxious Weeds and Invasive Plants
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				deemed susceptible to weed spread due to treatment activities to facilitate establishment of desirable vegetation."	
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